

1902 American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-615 FAX NO. (216) 821-4568



April 4 , 1996

OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

CERTIFIED LETTER
RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, HRE-8J Z 134 815 513
United States (U.S.) Environmental Protection Agency (EPA),
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604
Attention: Barbara Mazur

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Boulevard
Chicago, Illinois 60604
Attention: Richard Clarizio

Z 134 815 514

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INCORPORATED (INC.)
CIVIL ACTION NUMBER C87 - 1284A (N.D. OHIO)

Progress Report # 16

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order Number 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Administrative Code Number 3745-66-12(D)(4)

On January 9, 1996, Mr. Gary Deigan, Project Manager, Roy F. Weston, Inc. submitted to Mr. John Palmer, OEPA, December's Surcharge and Settlement Monitoring Monthly Report for American Steel Foundries's Sebring Landfill.

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dated In a letter February 2, 1996 to Ms. Bernadette Wellman, American Steel Foundries (ASF), Inc. Chicago, Illinois, Mr. John Palmer, OEPA, Division of Hazardous Waste Management, acknowledged receipt of and review of the Supplementary Groundwater Monitoring Supplementary Annual Report for 1994 for Based on that review he the Sebrina Landfill. requested American Steel Foundries complete Section 2, line W - 5 for MW survey the top of well casing at MW - 13 to within \pm 0.01 feet and explain the usage of data qualifier "KL".

In a letter dated February 5, 1996 to Ms. Bernadette Wellman, American Steel Foundries, Inc., Chicago Illinois, Mr. John Palmer, OEPA, Division of Hazardous Waste Management, acknowledged receipt of American Steel Foundries' response to Ohio EPA's November 23, 1996 letter to Ms. Wellman regarding Ohio EPA's review of American Steel Foundries' December 1993 ground water quality analytical results. Mr. Palmer indicated that American Steel Foundries has adequately responded to the four comments identified in the November 23, 1996 letter.

In a letter dated February 8, 1996 from Mr. John Palmer, OEPA, Division of Hazardous Waste Management to Ms. Bernadette Wellman, American Steel Foundries Inc., Chicago, Illinois, Mr. Palmer indicated that American Steel Foundries adequately responded to the four comments in a March 6, 1995 letter to American Steel Foundries regarding the June 1994 water quality analytical results from analysis of samples of ground water at American Steel Foundries' Sebring landfill.

Accompanying a letter dated February 13, 1996 to Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management from Mr. Gary J. Deigan, Principal Project Manager, Roy F. Weston, Inc., was the Settlement Monitoring Report for American Steel Foundries Sebring Landfill for the eleventh month of settlement monitoring. At this time Mr. Palmer was notified that settlement monitoring Plate 2 (SP - 2) was bent over to an approximately 30 degree position. According to Mr. Deigan, a new riser elevation would be established and that subsequent measurements at SP-2 will then reflect relative settlement and these measurements could be added to prior months to reasonably reflect total settlement.

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In a letter dated February 15, 1996 Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management, acknowledged receipt of American Steel Foundries' Surcharge and Settlement Monitoring - Monthly Report (Eleventh Month). Mr. Palmer reviewed the submittal and had several comments requiring a response in the following month's report. He requested an explanation for the steep change in the rate of settlement at SP-1, an explanation for the sudden rebound at SP-2, and steps to be taken to compensate for the effects of frost heave.

In a letter dated February 20, 1996 from Ms. Bernadette Wellman, Manager - Environmental Affairs, American Steel Foundries, to Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management, Ms. Wellman notified Mr. Palmer of the receipt of the Notice of Deficiency (NOD) for the Sebring Landfill. Ms. Wellman advised Mr. Palmer that American Steel Foundries will prepare a revised Closure Plan in accordance with the NOD on or before April 30, 1996. Ms. Wellman also indicated that she would forward a draft response to the NOD by March 23, 1996.

In a letter dated March 1, 1996 Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management acknowledged that the review of American Steel Foundries' September 1995 Groundwater Monitoring Program Plan for the Sebring Landfill was complete. As the result of this review, Ohio EPA had several comments that were listed in the March 1 letter.

In a letter dated March 4, 1996 Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management acknowledged that the review of American Steel Foundries' March, 1995 ground water quality analytical results for the March semi-annual sampling event at the Sebring landfill was complete. Based on this review, several comments were listed within the letter. Mr. Palmer requested that American Steel Foundries respond to these comments by March 29, 1996 to the Ohio EPA North East District Office.

In a letter dated March 5, 1996 Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management acknowledged that the review of American Steel Foundries' September, 1995 ground water quality analytical results for the September semi-annual sampling event at the Sebring landfill was complete. Based on this review, several comments were listed within the letter. Mr. Palmer requested that American Steel Foundries respond by March 29, 1996 to the Ohio EPA North East District Office.

U.S. vs. Amsted, Industries, Inc. Civil Action No. C87 - 1284A (N.D. Ohio) Report Number 16 / April 10, 1996 / Page 4 of 6

Accompanying a letter dated March 20, 1996 to Mr. John Palmer, Ohio EPA, Division of Hazardous Waste Management from Mr. Gary J. Deigan, Principal Project Manager, Roy F. Weston, Inc., was the Settlement Monitoring Report for American Steel Foundries Sebring Landfill for month 12 of settlement monitoring data. At this time Mr. Deigan responded to comments posed by Mr. Palmer in his February 15, 1996 letter regarding the February 13, 1996 settlement report for the Sebring landfill.

NOTE: During this last quarter there have been no construction activities at the Sebring Facility.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."

A letter dated February 5, 1996 was sent from Pat Petrella, Environmental Engineer, American Steel Foundries, Alliance, Ohio to U.S. EPA, Ohio EPA, and the Mahoning County (Ohio) Health Department providing notification that semi-annual groundwater sampling would be conducted at American Steel Foundries' Sebring Landfill on February 22 and 23, 1996.

The first round of semiannual sampling at the Sebring landfill for 1996 was conducted by Roy F. Weston for American Steel Foundries on February 22 and 23, 1996 Roy F. Weston, Inc.

In a letter dated March 29,1996 from Mr. John F. Oesch, Plant Manager, American Steel Foundries, Alliance Facility, to Chief RCRA Enforcement Branch, U.S. EPA and Chief, SWERB, Section V, Office of Regional Counsel, Mr. Oesch notified U.S. EPA, Ohio EPA, and The Mahoning County(Ohio) Health Department that revisions to Tables 3 through 6 of analytical data in the semiannual ground water monitoring report for the sampling event at the Sebring Landfill dated September, 1995 were required. The revised tables were attached to the March 29, 1996 letter.

TEST RESULTS AND SAMPLING SUMMARY

American Steel Foundries plans to discontinue monitoring each load of Electric Arc Furnace (EAF) dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals.

U.S. vs. Amsted, Industries, Inc. Civil Action No. C87 - 1284A (N.D. Ohio) Report Number 16 / April 10, 1996 / Page 5 of 6

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

cours very truly,

J. F. Oesch PLANT MANAGER

PPP / Attachment

U.S. vs. Amsted, Industries, Inc. Civil Action No. C87 - 1284A (N.D. Ohio) Report Number 15 / April 10, 1996 / Page 6 of 6

cc: REB

JFO / RBR / RML

PFF BMW

Ohio EPA Z 134 815 515
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA Z 134 815 516
Division of Hazardous Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Ohio EPA Z 134 815 517
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ. Amsted Industries, Inc. 44th Floor - Boulevard Towers South 205 N. Michigan Ave. Chicago, Illinois 60601

Mahoning County Health District Chief, Solid Waste Program 2801 Market Street Youngstown, Ohio 44507-1649 Attn: R. D. Setty Z 134 815 566

C: \WP51\HAZWASTE\USVAMSTD.496

ATTACHMENT A

UNITED STATES V. AMSTED INDUSTRIES, INCORPORATED (INC.)
CIVIL ACTION NUMBER C 87 - 1284A (N.D. OHIO)

PROGRESS REPORT NUMBER 16

ELECTRIC ARC FURNACE DUST COMPOSITE SAMPLE REPORTS

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance Oh 44601

Report Date: 03/21/96

Envirite Waste Stream #: CS1373

Sample Collection Date: 03/18/96 Date Analysis Completed: 03/20/96

Waste Description: EAF Furnace Dust

Box #:

Parameter Results

pH (TCLP) 6.8 S.U.

Total CN (as received) 1.3 mg/kg

TCLP Arsenic <0.0077 mg/l

TCLP Barium <1.6 mg/l

TCLP Cadmium 1.9 mg/l

TCLP Chromium <0.10 mg/l

TCLP Lead 0.82 mg/l

TCLP Mercury 0.0032 mg/l

TCLP Nickel <0.30 mg/l

TCLP Selenium <0.0080 mg/l

TCLP Silver <0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Mingling Mawkins

cc: File

FAX: 03/21/96 #PAGES-1	From: CHERYL HAWKINS
TO: PAT PETRELLA	ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES	Phone: 330-456-6238
FAX #: 330-821-4568	FAX #: 330-456-2801

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance Oh 44601

Report Date: 03/05/96

Envirite Waste Stream #: CS1373

Sample Collection Date: 02/23/96

Date Analysis Completed: 02/29/96

Waste Description: EAF Furnace Dust

Box#: 117

Results Parameter

6.5 S.U. pH (TCLP)

Total CN (as received) 1.0 mg/kg

<0.0077 mg/l TCLP Arsenic

<1.6 mg/l TCLP Barium

TCLP Cadmium 1.7 mg/l

<0.10 mg/l TCLP Chromium

0.98 mg/l TCLP Lead

<0.0008 mg/l TCLP Mercury

0.62 mg/l TCLP Nickel

<0.0080 mg/l TCLP Selenium

TCLP Silver <0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use. Allesto malle line

Analysis Approved by:

cc: File

FAX: 03/05/96 #PAGES - 1	From: CHERYL HAWKINS
TO: PAT PETRELLA	ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES	Phone: 216-456-6238
FAX #: 216-821-4568	FAX #: 216-456-2801

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 04/03/96 Envirite Waste ID#: CS1373

Sample Collection Date: 02/01/96 Date Analysis Completed: 02/06/96

Waste Description: E A F Furnace Dust

<u>Parameter</u>	<u>Results</u>
pH (As Received)	11.0 s.u.
Total CN (As Received)	0.52 mg/L
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	1.9 mg/L
TCLP Cadmium	1.2 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	0.72 mg/L
TCLP Mercury	<0.0023 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

A/RC/Coordinator

FAX: 04/03/96	#Pages - 1	From: Ed Konz		
TO: Pat Petrella		ENVIRITE CORPORATION		
CO: American Steel Foundries		Phone: 330-456-6238		
FAX#: 1-330-821-4568		FAX#: 330-456-2801		

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance Oh 44601

Report Date: 01/23/96

Envirite Waste Stream #: CS1373

Sample Collection Date: 01/12/96 Date Analysis Completed: 01/18/96

Waste Description: EAF Furnace Dust

Box #: none given

Parameter Results

pH (TCLP) 6.7 S.U.

Total CN (as received) 1.0 mg/kg

TCLP Arsenic <0.0077 mg/l

TCLP Barium <1.6 mg/l

TCLP Cadmium 1.8 mg/l

TCLP Chromium <0.10 mg/l

TCLP Lead <0.64 mg/l

TCLP Mercury 0.0022 mg/l

TCLP Nickel 0.24 mg/l

TCLP Selenium <0.0080 mg/l

TCLP Silver <0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

A/RC Coordinator

cc: File

FAX: 01/23/96	#PAGES - 1	From: CHERYL HAWKINS		
TO: PAT PETRELLA		ENVIRITE CORPORATION		
CO: AMERICAN STEEL FOUNDRIES		Phone: 216-456-6238		
FAX #: 216-821-4568		FAX #: 216-456-2801		

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1902 American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823 FAX NO. (216) 821-4568

JAN 1 6 1996

JOHN OESCH PLANT MANAGER

January 10, 1996

OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

CERTIFIED LETTER RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, HRE-8J U.S. EPA, Region V 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Barbara Mazur Z 134 815 427

Chief, SWERB Section V
Office of Regional Counsel
U.S. EPA Region V, 5CS-TUB3
77 West Jackson Blvd.
Chicago, Illinois 60604
Attention: Richard Clarizio

Z 134 815 428

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

Progress Report # 15

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4)

In a letter dated October 11, 1995 addressed to Ms. Bernadette Wellman, ASF from Mr. John Palmer, Ohio EPA, Mr. Palmer acknowledged receipt of September's Surcharge and Settlement Monitoring Rept. for ASF.

On November 7, 1995, Mr. Gary Deigan, Project Manager, Roy F. Weston, Inc. submitted to Mr. John Palmer, OEPA, October's Surcharge and Settlement Monitoring - Monthly Report for ASF's

U.S. vs. Amsted, Industries, Inc. Civil Action No. C87 - 1284A (N.D. Ohio) Rept. No. 15 / January 10, 1996 / Page 2 of 5

Sebring landfill (OHD 017 497 587). In the same letter, Mr. Deigan notified Mr. Palmer that Tecumseh Berm Pond construction has been postponed until spring of 1996 due to delays in obtaining property access, excessive pond pumping schedule, and the conclusion of the regular construction season.

On November 9, 1995, Mr. John Palmer, OEPA acknowledged receipt of October's Surcharge and Settlement Monitoring Monthly Rept. for ASF's Sebring Landfill in a letter addressed to Ms Bernadette Wellman, ASF, Chicago. Mr. Palmer requested notification of the start of construction activities at the Tecumseh Pond in the Spring.

In a letter dated December 8, 1995 from Mr. Gary Deigan, Roy F. Weston, Inc. to Mr. John Palmer, Environmental Specialist, NEDO, OEPA, Mr. Deigan submitted to Mr. Palmer the Surcharge and Settlement Monitoring - Monthly Report for ASF Sebring Landfill for the month of November, 1995.

NOTE: During this last quarter there have been no construction activities at the Sebring Facility.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

- 1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."
- 5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.
- 6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

U.S. vs. Amsted, Industries, Inc. Civil Action No. C87 - 1284A (N.D. Ohio) Rept. No. 15 / January 10, 1996 / Page 3 of 5

The second round of semiannual sampling at the Sebring landfill was conducted the week of Sept. 18, 1995 by Roy F. Weston for ASF. On November 16, 1995, Messrs. Gary Deigan and Gregory S. Kinsall of Roy F. Weston, Inc. submitted to Ms. Bernadette Wellman, ASF, Chicago the Semiannual Groundwater Monitoring Rept. for sampling activities conducted on Sept. 19 and 20, 1995 at the ASF landfill in Sebring, Ohio. Following some minor adjustments, the report was submitted to EPA.

On December 15, 1995, in a letter from Mr. John Oesch, ASF, Alliance Plant Manager, to Ms. Barbara Mazur, Chief, RCRA Enforcement Branch, US EPA, Region V, ASF submitted the Semiannual Groundwater Monitoring Rept., for samples collected on Sept. 19 and 20, 1995 at the Sebring Landfill. Tentative conclusions drawn from these results indicate that Landfill Wastes are not impacting local groundwater.

On December 26, 1995, Mr. John Palmer, OEPA notified Ms. Bernadette Wellman, ASF, Chicago that the Semiannual Groundwater Monitoring Results - Sept., 1995 were received by OEPA. The letter indicated that the OEPA, Division of Drinking Water was reviewing the submittal and that results would be forwarded to ASF upon completion of the review.

TEST RESULTS AND SAMPLING SUMMARY

American Steel Foundries plans to monitor each load of EAF dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

U.S. vs. Amsted, Industries, Inc. Civil Action No. C87 - 1284A (N.D. Ohio) Rept. No. 15 / January 10, 1996 / Page 4 of 5

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

J. F. Desch PLANT MANAGER

PPP Attachment J.S. vs. Amsted, Industries, Inc.
Civil Action No. C87 - 1284A (N.D. Ohio)
Rept. No. 15 / January 10, 1996 / Page 5 of 5

CC: REB
BMW
PFF
RML
RBR

Ohio EPA
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43268-0149

Ohio EPA Z 134 815 430 Division of Hazardous Waste Management Northeast District Office 2110 East Aurora Road Twinsburg, Ohio 44087-1969

Ohio EPA Z 134 815 431
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ. Amsted Industries, Inc. 44th Floor - Boulevard Towers South 205 N. Michigan Ave. Chicago, Illinois 60601

Mahoning County Health District

Z 134 815 432

Chief, Solid Waste Program 2801 Market Street Youngstown, Ohio 44507-1649 Attn: R. D. Setty

C: \WP51\HAZWASTE\USVAMSTD.196

APPENDIX A

<u>ELECTRIC ARC FURNACE DUST SAMPLE</u>

<u>COMPOSITE REPORTS</u>

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance Oh 44601

Report Date: 01/03/96

Envirite Waste Stream #: CS1373

Sample Collection Date: 12/21/95 Date Analysis Completed: 12/28/95

Waste Description: EAF Furnace Dust

Sample #: 117

Parameter	Results
pl-I (TCLP)	7.1 S ₋ U.
Total CN (as received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	<1.6 mg/l
TCLP Cadmium	1.6 mg/l
TCLP Chromium	0.66 mg/l
TCLP Lcad	<0.64 mg/l
TCLP Mercury	0.0021 mg/l
TCLP Nickel	<0.30 mg/l
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or CARC Condinator implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

cc: File

FAX: 12/08/95 #PAGES - 1	From: CHERYL HAWKINS
TO: PAT PETRELLA	ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES	Phone: 216-456-6238
FAX #: 216-821-4568	FAX #: 216-456-2801

RESAMPLE SAMPLE **ANALYSIS REQUEST FORM**

ENVIRITE CORPORATIO

Generator Name:	AMERICAN STEE	L FOUNDRIE	S	
Facility Address:	1001 E. BROAD	WAY ST.		
,	ALLIANCE	OHIO		44601
Stream Number:	CS1373		State Date Results Ne	z⊮ eded: TO 10 DAYS
Waste Code:	D006, D008	241		EACH BOX
Volume:				
Generator's Descriptio	on / Identification of Was EAF FURNACE D			
	D006, D008			
Comments:				
	TCLP METALS O	NLY		
	SAMPLE NO. 100	A 3P Y 2	BOX NO.	115
Request Submitted by	T.C.BRADWAY		Date Submitted:	10/4/95
CERTIFICATION:				
myself as both the sa	esignated the location presentative. In the everampler and witness in the are correctly identified	he snaces held	nple collection an onally collected to w. If I have not co	d the sample accompanying he sample, I have identified bilected the sample, both the
Date of Sampling:	10/4/22		Time of Sampling	: Com () AM/PM
Sampler's Name:		BRADWAY		
Fitle and Affiliation of S	Sampler: <u>ENVIRONM</u> E	ENTAL MANAG	ER AMERICAN	STEEL FOUNDRIES
Sampler's Signature:	TEB	medan		OTHER CONDETTS
Vitness's Name:		kz	9	
Fitle and Affiliation of \	Witness: RECID	DUST SAMP	E 10-4-95	X Kolin Mille
Witness's Signature:				
ENVCHCDY.EAF				,

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

Recycled Paper

RESAMPLE SAMPLE ANALYSIS REQUEST FORM

- Copy - -



Generator Name:	AMERICAN STEEL	FOUNDRIES	3	
Facility Address:	1001 E. BROADWA	AY ST.		
,	ALLIANCE	OHIO		44601
Stream Number:	CS1373		State Date Results Need	ded: TO 10 DAYS
Waste Code:	D006, D008		Frequency:	
Volume:	_			
Generator's Description	n / Identification of Waste EAF FURNACE DUS			
	D006, D008		7.1111111	
Comments:	TCLP METALS ONI	- 37		
	THE METALS UNI	, <u>Y</u>		
	SAMPLE NO. 1/2	895A	BOX NO.	
Request Submitted by:	PAT PETRELLA		Date Submitted:	11/28/95
CERTIFICATION:				
this document is repaired in the said myself as both the said	resentative. In the eve	ent that I pers le spaces belo	conally collected th	the sample accompanying e sample, I have identified lected the sample, both the
Date of Sampling:	11/2/95		Time of Sampling:	Composite AM/PM
Sampler's Name:	PAT	PETRELLA		
Title and Affiliation of S	ampler: <u>ENVIRONME</u>	ENTAL, ENGI	NEER, AMERICAN	N STEEL FOUNDRY
Sampler's Signature:	Seit F	Zfall		
Witness's Name:				
Title and Affiliation of W	Vitness:	,	7/	
Witness's Signature:	Kaller		Miller	
ENVCHODY EAR			•	

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.





CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance Oh 44601

Report Date: 12/08/95

Envirite Waste Stream #: CS1373

Sample Collection Date: 11/02/95

Date Analysis Completed: 12/01/95

Waste Description: EAF Furnace Dust

Sample #: 112895A **

Results <u>Parameter</u>

6.9 S.U. pH (TCLP)

1.0 mg/kg Total CN (as received)

<0.0077 mg/l TCLP Arsenic

<1.6 mg/l TCLP Barium

 $1.3 \, \text{mg/l}$ TCLP Cadmium

<0.10 mg/l TCLF Chromium

TCLP Lead <0.64 mg/l

<0.0008 mg/l **TCLP Mercury**

<0.30 mg/l TCLP Nickel

<0.0080 mg/l TCLP Selenium

<0.082 mg/l TCLP Silver

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use. Chuythynn daukin

Analysis Approved by:

cc. File

** BOX NUMBER NOT STATED ON REQUEST FORM

FAX: 12/08/95 # PAGES - 1	From: CHERYL HAWKINS		
TO: PAT PETRELLA	ENVIRITE CORPORATION		
CO: AMERICAN STEEL FOUNDRIES	Phone: 216-456-6238		
FAX#: 216-821-4568	FAX #; 216-456-2801		





Generator Name:	AMERICAN STEEI	FOUNDRIE:	S		
Facility Address:	1001 E. BROADV	VAY ST.			
•	ALLIANCE	OHIO		4460	
Stream Number:	CS1373		State Date Results Nee	eded? TO 10 DA	ZIP
Waste Code:	D006, D008		Frequency:		
Volume:					<u></u>
Generator's Descriptio	on / Identification of Wast EAF FURNACE DU	e: ST			
	D006, D008				
Comments:		a.			
	TCLP METALS ON	T V			
-		## <u>*</u>			
***	SAMPLE NO. Z/	2194	BOX NO.	116	
	110	1295A			
Request Submitted by	PAT PETRELLA		Date Submitted:	11-2-9	5
ERTIFICATION:					
certify that I have de nis document is rep nyself as both the sa ampler and witness	esignated the location presentative. In the eventative in the event and witness in the are correctly identified	point(s) for same ent that I perso le spaces below below.	ple collection and mally collected the v. If I have not coll	the sample accomes sample, I have in ected the sample,	ipanying dentified both the
ate of Sampling:	11/2/95		Time of Sampling:	Comparis	4 h 4 (D) 4
ampler's Name:	PAT	PETRELLA	o or oampling.	composite	_AM/PM
itle and Affiliation of S	ampler: <u>ENVIRONME</u>	NTAL ENGIN	FFD AMDDICAN	CORRECT TOTAL	
ampler's Signature:	Jan	67 Pe	kell	STEEL FOUNDR	<u>Y</u>
'itness's Name:	RECID SAME	NE 11-2-9.	5 94A X	K. Milli	<u>a 11.5</u>
tle and Affiliation of W	/itness:		U	V IIIIN	<u>~//-</u> ~
itness's Signature:					
NVCHCDV FAF					

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.





CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance Oh 44601

Report Date: 11/10/95

Envirice Waste Stream #: CS1373

Sample Collection Date: 11/02/95

Date Analysis Completed: 11/06/95

Waste Description: EAF Furnace Dust

Box: 116

Parameter	Results
pH (TCLP)	6.7 S.U.
Total CN (as received)	0.50 mg/kg
TCLP Arsenic	<0.0077 mg/1
TCLP Barium	<1.6 mg/l
TCLP Cadmium	1.5 mg/l
TCLP Chromium	<0.10 mg/l
TCLP Lead	<0.64 mg/l
TCLP Mercury	<0.0008 mg/i
TCLP Nickel	<0.30 mg/l
TCLP Selenium	0.051 mg/l
TCLP Silver	<0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use CARC Coordinator

Analysis Approved by:

œ: File

FAX: 11/10/95 #PAGES • 1	From: CHERYL HAWKINS
TO: PAT PETRELLA	ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES	Phone: 216-456-6238
FAX #: 216-821-4568	FAX #: 216-456-2801

RESAMPLE SAMPLE **ANALYSIS REQUEST** FORM



Generator Name:	AMERICAN STEEL	FOUNDRIE	S		
Facility Address:	1001 E. BROADW	AY ST.			
·	ALLIANCE	OHIO		44	601
Stream Number:	city CS1373		State Date Results Ne	7 TO 10	<i>Z⊮</i> DAYS
Waste Code:	D006, D008		Frequency:	EACH BO	X
Volume:					
Generator's Descripti	on / Identification of Wast EAF FURNACE DU	e: ST			
	D006, D008				
Comments:				***************************************	
	TCLP METALS ON	L.Y.			****
	SAMPLE NO. \\\	195A	BOX NO.	## (1C)
Request Submitted by	y: PAT PETRELLA		Date Submitted:	11/2/95	
CERTIFICATION: I certify that I have dethis document is remained by the second witness ampler and witness	lesignated the location presentative. In the eventative ampler and witness in the are correctly identified	point(s) for san ent that I pers se spaces belo below.	nple collection and onally collected to waith the collected to waith the collected to the c	d the sample ac he sample, I ha blected the sam	companying ve identified ple, both the
Date of Sampling:			Time of Sampling		44.4/04
Sampler's Name:	PAT	PETRELLA			AM/PM
Title and Affiliation of	Sampler: ENVIRONM	PNONT PNOT	NEER, AMERICA	N OFFER POST	
Sampler's Signature:		* DA	a Pla	<u> </u>	NDRY
Witness's Name:	RECO 1	0-18-95 \$	1B		,
Fitle and Affiliation of		MI			
Witness's Signature:		- We to the			
ENVCHCDY.EAF					

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.





CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance Oh 44601

Report Date: 10/26/95

Envirite Waste Stream #: CS1373

Sample Collection Date: 10/18/95

Date Analysis Completed: 10/20/95

Waste Description: EAF Furnace Dust

Box: 110

Parameter Results

pH (TCLP) 6.9 S.U.

Total CN (as received) 1.0 mg/kg

TCLP Arsenic <0.0077 mg/l

TCLP Barium <1.6 mg/l

TCLP Cadmium $1.5 \, \text{mg/l}$

TCLP Chromium <0.10 mg/l

TCLP Lead <0.64 mg/l

TCLP Mercury <0.0008 mg/l

TCLP Nickel 1.2 mg/l

TCLP Selenium <0.0080 mg/l

TCLP Silver <0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use. Kynspulins rainagor

Analysis Approved by:

cc: File

FAX: 10/26/95 # PAGES	• 1 From: CHERYL HAWKINS
TO: PAT PETRELLA	ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDS	
FAX #: 316-821-4568	FAX #: 216-456-2801



1902 American Steel Found

1001 EAST BROADWAY * ALLIANCE, OHIO 44601 * (216) 823-6150 FAX NO. (216) 821-4568

JOHN OESCH PLANT MANAGER

October 10, 1995

OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

z 309 033 251

Z 309 033 252

CERTIFIED LETTER RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, HRE-8J U.S. EPA, Region V 77 West Jackson Blvd.

Chicago, Illinois 60604

Attention: Barbara Mazur

Chief, SWERB Section V Office of Regional Counsel U.S. EPA Region V, 5CS-TUB3 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Richard Clarizio

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

Progress Report # 14

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

SEBRING FACILITY -Closure and Post Closure Requirements: D.

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4)

In a June 30, 1995 letter from Mr. Gary J. Deigan, Roy F. Weston Inc. to Mr. John Palmer, OEPA, a followup to the June 13, 1995 letter was provided regarding Tecumseh Pond / Sebring Landfill Separation Berm. The letter supported the June 13, 1995 Monitoring Report for the Sebring Surcharge and Settlement Landfill. Weston concluded that Closure will ensure a less than 50 % rapid drawdown of pool depth in the pond before drawdown based on data collected thus far.

A July 7, 1995 letter from Mr. John Palmer, OEPA to Ms. Bernadette Wellman, ASF confirmed receipt of ASF's June 30, 1995 Separation Berm Report for the Sebring landfill as prepared by Roy F. Weston, Inc. OEPA's Central Office would respond with their analysis and comments through Mr. John Palmer, OEPA.

On July 13, 1995 Mr. Gary J. Deigan, Weston, submitted the Monthly Surcharge and Settlement Report for ASF's Sebring Landfill for the month of June in accordance with the approved Surcharge and Settlement Plan for the site.

A July 18, 1995 letter from Mr. John Palmer, OEPA to Ms. Bernadette Wellman, ASF confirms receipt of the July 13 submittal from Mr. Deigan and acknowledges approval of the report.

On August 9, 1995 Mr. Gary J. Deigan, Weston, submitted the Monthly Surcharge and Settlement Report for ASF's Sebring Landfill for the month of July in accordance with the approved Surcharge and Settlement Plan for the site.

On September 11, 1995 Mr. Gary J. Deigan, Weston, submitted the Monthly Surcharge and Settlement Report for ASF's Sebring Landfill for the month of August in accordance with the approved Surcharge and Settlement Plan for the site.

A September 15, 1995 letter from Mr. John Palmer, OEPA to Ms. Bernadette Wellman, ASF confirms receipt of the Sept. 11 submittal from Mr. Deigan and acknowledges approval of the report.

NOTE: During this last quarter there have been no construction activities at the Sebring Facility.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

- 1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."
- 5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.
- 6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In an August 21, 1995 letter to Ms. Burnadette Wellman, ASF, Mr. John Palmer acknowledged receipt of the company's March, 1995 Semiannual Groundwater Monitoring Report. It was received on August 18, 1995. A copy of this report with the above letter was sent to U.S. EPA Region V, RCRA Enforcement and SWERB Section V, Regional Counsel. The report is currently under review by both agencies.

The second round of semiannual sampling at the Sebring landfill was conducted the week of Sept. 18, 1995 by Roy F. Weston for ASF. At the time of this submittal, ASF is awaiting sampling results and a report from Roy F. Weston, Inc.

TEST RESULTS AND SAMPLING SUMMARY

American Steel Foundries plans to monitor each load of EAF dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

J. F. Oesch PLANT MANAGER

PPP Attachment

INITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: REB

BMW

PFF

RML

RBR

Ohio EPA Z 309 033 254

Chief, Division of Solid and Hazardous Waste

1800 WaterMark Drive

P.O. Box 1049

Columbus, Ohio 43268-0149

Ohio EPA Z 309 033 255

Division of Hazardous Waste Management

Northeast District Office

2110 East Aurora Road Twinsburg, Ohio 44087-1969

Ohio EPA Z 309 033 256

Supervisor, division of Solid and Infectious Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.

Amsted Industries, Inc.

44th Floor - Boulevard Towers South

205 N. Michigan Ave.

Chicago, Illinois 60601

Mahoning County Health District

Chief, Solid Waste Program

2801 Market Street

Youngstown, Ohio 44507-1649

Attn: R. D. Setty

Z 309 033 257

C:\WP51\HAZWASTE\USVAMSTD.PP7

RESAMPLE SAMPLE ANALYSIS REQUEST FORM



Generator Name:	AMERICAN STE	EL FOUNDRIE:	S		
Facility Address:	1001 E. BROA	DWAY ST.	- Mile than a second and the second		
•	ALLIANCE	OHIO		44601	
Stream Number:	CS1373		state Date Results Needed	7 TO 10 DAY	ZIP S
Waste Code:	D006, D008	774. * 2. 134 · · ·	Frequency:		
Volume:		***	Troquotioy.	Billon Bon	
Generator's Description	/ Identification of Wa				
***************************************	D006, D008				
Comments:					· · · · · · · · · · · · · · · · · · ·
	TCLP METALS	ONLY			·
	SAMPLE NO. ►	71895R	BOX NO.)	
Request Submitted by:	T.C.BRADWAY		Date Submitted:	1/18/95	
CERTIFICATION:					
I certify that I have detailed this document is repringled the sare myself as both the sare sampler and witness a	esentative. In the npler and witness in	event that I pers I the spaces belo	conally collected the s	ample I have id	entified
Date of Sampling:	7/18/9	15	Time of Sampling: <u></u>	omposite	_AM/PM
Sampler's Name:	T.	C.BRADWAY			
Title and Affiliation of S	ampler: <u>ENVIRON</u>	MENTAL MANAC	SER, AMERICAN ST	EEL FOUNDRIE	s 🤻
Sampler's Signature:	7 C C	audent	1		
Witness's Name:			\sim		
Title and Affiliation of W	/itness:			· · · · · · · · · · · · · · · · · · ·	
Witness's Signature:					,
ENVCHCDY.EAF					

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street

Alliance, Ohio 44601

Report Date: 07/31/95

Envirite Waste ID#: CS1373

Sample Collection Date: 07/18/95 Date Analysis Completed: 07/25/95

Waste Description: EAF Furnace Dust BOX #: 111

Parameter	<u>Results</u>
pH (TCLP)	6.7 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	<1.6 mg/l
TCLP Cadmium	1.8 mg/l
TCLP Chromium	0.14 mg/l
TCLP Lead	1.0 mg/l
TCLP Mercury	0.0026 mg/l
TCLP Nickel	<0.30 mg/l
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

OA/BØ Coordinator

cc: File

FAX: 7/31/95 #Pag	es - 1	From: CHERYL HAWKINS	
TO: TERRY BRADWAY		ENVIRITE CORPORATION	
CO: AMERICAN STEEEL FOUND.		Phone: 216-456-6238	
FAX#: 216-821-4568		FAX#: 216-456-2801	

RESAMPLE SAMPLE ANALYSIS REQUEST FORM



Generator Name:	AMERICAN STEEI	FOUNDRIES	3		
Facility Address:	1001 E. BROADV	VAY ST.	, Hub		
	ALLIANCE	OHIO		4460	1
Stream Number:	city CS1373		state Date Results Nee	eded: TO 10 DA	zip YS
Waste Code:	D006, D008			EACH BOX	
Generator's Description	n / Identification of Wast EAF FURNACE DU				
	D006, D008		700 PV 800 SQ - 20 SQ		
Comments:		**************************************			
	TCLP METALS ON	NLY			
	sample no. 9	0895A	BOX NO.	116	
Request Submitted by:	T.C.BRADWAY		Date Submitted:	9/8/95	
CERTIFICATION:					
I certify that I have de this document is rep myself as both the sa sampler and witness	resentative. In the ev mpler and witness in t	rent that I pers he spaces belo	nple collection an onally collected t w. If I have not co	d the sample accor he sample, I have ollected the sample,	npanying Identified , both the
Date of Sampling:	9/8/9	5	Time of Sampling	: Comp.	AM/PM
Sampler's Name:	T.C	BRADWAY			
Title and Affiliation of S	Sampler: <u>ENVIRONM</u>	ENTAL MANAG	ER, AMERICAN	STEEL FOUNDRI	ES
Sampler's Signature:	JEBr	muga	~		
Witness's Name:	-			<u> </u>	
Title and Affiliation of V	Vitness: RECID SA	MPLE 9-8-	95 X 8	fool	
Witness's Signature:	· · · · · · · · · · · · · · · · · · ·	JOB miley			•
ENVCHCDY.EAF					

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.





CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance Oh 44601

Report Date: 09/18/95

Envirite Waste Stream #: CS1373

Sample Collection Date: 09/08/95

Date Analysis Completed: 09/12/95

Waste Description: EAF Furnace Dust

Box: 116

Parameter Results

pH (TCLP) 6.8 S.U.

Total CN (as received) 1.0 mg/kg

TCLP Arsenic <0.0077 mg/l

TCLP Barium 1.6 mg/l

TCLP Cadmium 1.0 mg/l

TCLP Chromium <0.10 mg/l

TCLP Lead 0.56 mg/l

TCLP Mercury <0.0008 mg/l

TCLP Nickel <0.30 mg/l

TCLP Selenium <0.0080 mg/l

TCLP Silver <0.082 mg/l

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by: _

wythynnhaulus

cc: File

FAX: 9/27/95 #PAGES-1	From: CHERYL HAWKINS
TO: PAT PETRELLA	ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUNDRIES	Phone: 216-456-6238
FAX #: 216-821-4568	FAX #: 216-456-2801

07/18/95 12:48

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries

1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 07/18/95 Envirite Waste ID#: CS1373 Sample Collection Date: 06/28/95 Date Analysis Completed: 07/13/95

Waste Description: EAF Furnace Dust

115 BOX #:

Parameter	<u>Results</u>
рН (ТССР)	6.8 S.U.
Total CN (As Received)	0.50 mg/kg
TCLP Arsenic	<0.0077 mg/l
TCLP Barium	<1.6 mg/l
TCLP Cadmium >	3.0 mg/l
TCLP Chromium	<0.10 mg/l
TCLP Lead $\lambda \overline{3}$.	<0.64 mg/l
TCLP Mercury	0.0037 mg/l
TCLP Nickel	<0.30 mg/l
TCLP Selenium	<0.0080 mg/l
TCLP Silver	<0.082 mg/l

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Analysis Approved by:

CC:

File

FAX: 7/18/95 #Pages - 1	From: CHERYL HAWKINS	
TO: TERRY BRADWAY	ENVIRITE CORPORATION	
CO: AMERICAN STEEL FOUND.	Phone: 216-456-6238	
FAX#: 216-821-4568	FAX#: 216-456-2801	



OH 217218, 019, 9607242339/4 BFI WASTE CODE 250, 855, 965

WASTE APP	ROVAL REQUEST
	Action Requested: Allew Waste Approval Up-Date Approval - Previous Number: Disposal Site Requested: Allegard - 218 - 218 - 216 - 255 - 265 Company Number: Management Method Requested: Allegard - Acterization Data
SPEC	IAL WASTE
IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENT. INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS LEGIBLY PRINTED IN INK, AND SIGNED.	ATIVE OF THE WASTE GENERATOR. PLEASE READ THE S TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR
1. GENERA	TOR INFORMATION
a) Generator's Name: Amorican STarl You alice b) Generating Facility's Address: ICO/E. Brandway City: Allancy State: Oh Zip: 4460/ c) Generator's Representative: T.C. Bradway Title: Env. Mg/ Telephone: (2/6) 823-6150 Fax: (2/6) d) Emergency/Information Contact: SAMI Title:	e) State/Provincial/Local Registration No.: Generator's EPA Id. No.: ONDS 8/0 So Y/8 Industry Description/SIC Code: f) Customer's Name: g) Customer's Mailing Address: City: State: Zip: h) Representative: Telephone: ()
Telephone: ()	Fax: ()
c) Is this a treatment residue of a waste which was previously a restrict. If yes, describe the waste and the process generating the waste prio d) Is this a "Hazardous Waste" as defined by State, Provincial, or local. If yes, enter the Waste Identification Number if one has been assigned. Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution of the waste Identification Number: [The commended personal protection equipment and special handling in the process of the waste Identification Number: [Special Waste" of the waste Identification Number: [The commended personal protection equipment and special handling in the waste Identification Identification Number: [The commended personal protection equipment and special handling in the waste Identification Identification Number: [The commended personal protection equipment and special handling in the waste Identification Identification Number: [The commended personal protection equipment and special handling in the waste Identification Identification Number: [The commended personal protection equipment and special handling in the waste Identification Identification Number: [The commended personal protection equipment and special handling in the waste Identification Identifica	ed hazardous waste?
3. WASTE	PROPERTIES AT 72°F
a) Physical State: Solid □ Semi-solid □ Powder □ Liquid □ Combination b) Layers: □ Single-layered □ Bi-layered □ Multi-layered c) Colors(s): Describe BROWN WIFF BLACK	e) Density Range:
d) Odor: Describe からった □ None □ Mild □ Strong	g) pH: □ ≤2 □ 2.1 - 5.0 □ 5.1 - 9.0 □ 9.1 - 12.4 □ ≥ 12.5 □ N/A ဩ N/D

BFI WASTE CODE

4. REACTIVITY	5. THIS WASTE CONTAINS 6. SPECIAL WASTE COMPOSIT	TON
Note if the waste exhibits any of the following reactive properties: Water Reactive Acid Reactive Alkaline Reactive Oxidizer Autopolymerizable Pyrophoric Explosive Thermally Sensitive Shock Sensitive	Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6. Free Liquids	and/or
	7. TRANSPORTATION INFORMATION	· · · · · · · · · · · · · · · · · · ·
If the waste is a DOT Hazardous Proper USDOT Shipping Name: USDOT Hazard Class:	NONE	
	8. SUPPLEMENTAL INFORMATION	
☐ None	☐ Analytical Data ☐ Chain of Custody ☐ Memo/Letter ☐ Waste Compositio No. of Pages: No.	
	9. GENERATOR'S CERTIFICATION	
deliberate or willful omissions of control a regulated hazardous waste contain PCBs regulated by TSCA GENERATOR'S AUTHORIZED SECTION 15	diattached description is complete and accurate to the best of my knowledge and ability to determine composition or properties exist, that all known or suspected hazards have been disclosed, and that the by the USEPA, by an applicable State or Provincial authority, or by any applicable local authority, and (i.e., 40 CFR 761) or any Provincial authority. IGNATORY as identified in Section 1 (c): IGNATORY AS IGNATURE FILE TITLE	ie waste is
	REPRESENTATIVE SAMPLE CERTIFICATION	
f certify that the sample for which and preserved in a manner consi	with person obtaining the sample of the above described waste. analytical data was provided on the waste described above is representative of that waste and was described above is representative of that waste and was described above is representative of that waste and was described waste. (peel off label) AB 75/67 TRUCTOUNORIRS	collected

WCD# AB75167

95105932

LAB ID NO.

95 105932

DATE SAMPLED

TIME

RECEIVED

06/02/95

13:00

06/02/95 REPORTED

BFI WASTE SYSTEMS OF OHIO, INC.

5932

00000

06/09/95

	ರ್ಷ RESUBJE -	ន្ងៃក្រ⊟ក្		
TCLP EXTRACTION PROC	FINAL PH=5.08			
ZERO HEADSPACE EXTRT	COMPLETED 06/06/95			
TCLP METALS & BIAS %				
ARSENIC	<1.0	O. O	5. 0	MG/L
Spike recovery	100			7,
BARIUM	<0. 5	0.0	100.0	MG/L
Spike recovery	108			%
CADMIUM	<0.05	0.0	1.0	MG/L
Spike recovery	78			7.
CHROMIUM	<0.05	0.0	5. 0	MG/L
Spike recovery	78			%
SELENIUM	<0. 3	Q. O	1.0	MG/L
Spike recovery	9 6			7,
MERCURY	<0. 003	0. 0	0.2	MG/L
Spike recovery	101			7.
LEAD	<0. 2	0.0	5 . 0	MG/L
Spike recovery	96			"∕"
SILVER	<0. 2	0. 0	5. O	MG/L
Spike recovery	103			7.
TCLP SUPPL METALS				
NICKEL	<0. 2			MG/L
Spike recovery	100			7.
COPPER	<0. 05			MG/L
Spike recovery	99			%
ZINC	0. 36			MG/L
Spike recovery	78	-		7,
TCLP VOA'S & BIAS %				
METHOD NUMBER	8240			
VINYL CHLORIDE	<0.002	0. 0	0.2	MG/L
Spike recovery	92			%
1,1-DICHLOROETHYLENE	<0.002	0. 0	0. 7	MG/L
Spike recovery	78			%
METHYL ETHYL KETONE	<1.0	O. O	200	MG/L
Spike recovery	107	m -		%
CHLOROFORM	<0.002	O. O	6 . 0	MG/L
Spike recovery	96			%
CARBON TETRACHLORIDE	<0.002	Q. Q	O. 5	MG/L
Spike recovery	94			%

--- DIRECTORS --Patrick K. Jaynes Ph.D.
Anthony Nasrallah Ph.D.



7655 Market Street, Suit 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 365-3396 BFI WASTE SYSTEMS OF OHIO, INC. (MASSILLON ACCOUNT) 1043 STATE ROUTE 225 ATWATER OH 44201 WCD# AB75167

95105932

LAB ID NO.

95 105932

DATE SAMPLED

RECEIVED

06/02/95

13:00

TIME

06/02/95 REPORTED

BFI WASTE SYSTEMS OF OHIO, INC.

5932

00000

06/09/95

BENZENE
Spike recovery
1,2-DICHLOROETHANE
Spike recovery
TRICHLOROETHYLENE
Spike recovery
TETRACHLOROETHYLENE
Spike recovery
CHLOROBENZENE
Spike recovery
1,4-DICHLORDBENZENE
Spike recovery
TCLP REVIEW

HESTILAR	Carlo in the Management Hale of Angels of the Friends And A Commentation with the comment of the	Of CHARLES AND STATE OF STATE	
<0.002 98	0. 0	0. 5	MG/L
<0.002 102	0. 0	0. 5	MG/L %
<0.002 103	0. 0	0. 5	MG/L %
<0.002 101	O. O	0. 7	MG/L %
<0.002 106	Q. Q	100.0	MG/L %
<0.002 106	0. 0	7. 5	MG/L %

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24,1992 (57FR55114) REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

Aut The So

--- DIRECTORS --Patrick K. Jaynes Ph.D.
Anthony Nasrallah Ph.D.



7655 Market Street, Suit 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 365-3396 BFI WASTE SYSTEMS OF OHIO, INC. (MASSILLON ACCOUNT) 1043 STATE ROUTE 225 ATWATER OH 44201



American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150 FAX NO. (216) 821-4568

JOHN OESCH PLANT MANAGER

July 05, 1995

CERTIFIED LETTER RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, HRE-8J U.S. EPA, Region V 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Barbara Mazur Z 055 522 324

Chief, SWERB Section V Office of Regional Counsel U.S. EPA Region V, 5CS-TUB3 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Richard Clarizio Z 055 522 325

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

RESPONSE TO OEPA 06/21/95 LETTER

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R.# 265.118 (d) (4) and (f) and Ohio Admin. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

In a June 21, 1995 letter from Mr. John Palmer, Environmental Specialist, Ohio EPA requested clarification of membrane thickness terminology in Sections 4.1 & 4.5 of the "CLOSURE CERTIFICATION REPORT FOR ELECTRIC ARC FURNACE BAGHOUSE HAZARDOUS WASTE MANAGEMENT UNIT".

Please be advised that American Steel Foundries confirms the Ohio EPA assumption that (ML) referred to in sections 4.1 & 4.5 should have been (MIL) and that in both cases, the unit of measure was thickness (i.e., 0.001 inches).

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

J. F. Oesch PLANT MANAGER

TCB Attachment

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: REB

BMW

PFF

RML

RBR

Ohio EPA

Z 055 522 326

Chief, Division of Solid and Hazardous Waste

1800 WaterMark Drive

P.O. Box 1049

Columbus, Ohio 43268-0149

Ohio EPA

Z 055 522 327

Division of Hazardous Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Ohio EPA

Z 055 522 328

Supervisor, division of Solid and Infectious Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.

Amsted Industries, Inc.

44th Floor - Boulevard Towers South

205 N. Michigan Ave.

Chicago, Illinois 60601

Mahoning County Health District

Chief, Solid Waste Program

2801 Market Street

Youngstown, Ohio 44507-1649

Attn: R. D. Setty

Z 055 522 329

C:\WP51\HAZWASTE\EAFCLRPT.795



American Steel Foundries

RECEIVED

JUL 0 7 1995

JOHN OESCH

1001 EAST BROADWAY * ALLIANCE, OHIO 44601 * (216) 823-6150 FAX NO. (216) 821-4568

July 03, 1995

OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

CERTIFIED LETTER RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, HRE-8J U.S. EPA, Region V 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Barbara Mazur Z 055 522 324

Chief, SWERB Section V Office of Regional Counsel U.S. EPA Region V, 5CS-TUB3 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Richard Clarizio Z 055 522 325

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

Progress Report # 13

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R.# 265.118 (d) (4) and (f) and Ohio Admin. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

In Mr. John F. Oesch's letter of May 10, 1995, American Steel Foundries formally submitted the "ELECTRIC ARC FURNACE BAGHOUSE CLOSURE CERTIFICATION REPORT" to the U.S. EPA and the Ohio EPA.

Mr. John Palmer from the Northeast District Office, Ohio EPA, inspected the Electric Arc Furnace Baghouse Closure Unit site at the Alliance Plant of American Steel Foundries on June 14, 1995.

In a June 21, 1995 letter from Mr. John Palmer, Environmental Specialist, Ohio EPA to Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, John acknowledged receipt of the Closure Certification Report the Electric Arc Furnace Baghouse.

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4)

As an attachment to a February 27, 1995 letter, Mr. John Oesch, Plant Manager, American Steel Foundries, submitted a February 1995 revision of the Surcharge and Settlement Plan for Ohio EPA review.

On March 04, 1995 the initial phase of the construction work for the Surcharge and Settlement Plan was completed at the Sebring Landfill.

In a March 07, 1995 correspondence from Mr. John Palmer, Environmental Specialist, Ohio EPA, to Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, John asked for clarification of details for the Sebring Landfill Surcharge and Settlement Plan.

On March 27, 1995 in a letter to Mr. John Palmer, Ohio EPA, Northeast District Office, Ms. B. M. Wellman, American Steel Foundries responded to Mr. John Palmer's March 07,1995 request.

Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, responded to Mr. John Palmer's March 7, 1995 correspondence of concerns in a March 27, 1995 letter.

In an April 4, 1995 letter to Ms. B. M. Wellman of American Steel Foundries, Mr. John Palmer from Ohio EPA acknowledged receipt of the March 27, 1995 submittal.

In an April 18, 1995 letter from Roy F. Weston Inc., Mr. Gary Deigan, Principal Project Manager, submitted to Mr. John Palmer of the Ohio EPA the Surcharge and Settlement Monitoring - Monthly Report for the April 5, 1995 survey for American Steel Foundries.

Mr. John Palmer, Ohio EPA acknowledged receipt of the April 18, 1995 submittal in a letter to Ms. B. M. Wellman from American Steel Foundries in an April 27, 1995 letter.

On April 27, 1995 a meeting was held at the Alliance Plant of American Steel Foundries with representatives of the Ohio EPA Columbus Office and the Northeast District Office. Also included in the discussions were representatives from Roy F. Weston Inc., American Steel Foundries' consultant.

Topics of discussion in the April 27, 1995 meeting included the Following:

- 1. A preliminary review of the Revised Sebring Landfill Closure Plan.
- 2. December Groundwater Sample Report
- 3. Revisions to Groundwater Monitoring Well program
- 4. Surcharge and Settlement Plan activities
- 5. Plans for Separation Berm Construction
- 6. A site review

In a May 16, 1995 letter from Roy F. Weston Inc., Mr. Gary Deigan, Principal Project Manager, submitted to Mr. John Palmer of the Ohio EPA the Surcharge and Settlement Monitoring - Monthly Report for the May 8, 1995 survey for American Steel Foundries.

Mr. John Palmer, Ohio EPA acknowledged receipt of the May 16, 1995 submittal in a letter to Ms. B. M. Wellman from American Steel Foundries in a May 19, 1995 letter.

In a June 13, 1995 telefax From Mr. John Palmer, Ohio EPA to Ms. B. M. Wellman, American Steel Foundries, John requested additional information about to the separation berm construction.

In a June 13, 1995 letter from Mr. Gary Deigan of Roy F. Weston Inc. for American Steel Foundries, four of the concerns from Mr. Palmer's Telefax were addressed with attached construction specifications. Comment No. 5 of Mr. Palmer's telefax will to be addressed under separate cover.

In a June 13, 1995 letter from Roy F. Weston Inc., Mr. Gary Deigan, Principal Project Manager, submitted to Mr. John Palmer of the Ohio EPA the Surcharge and Settlement Monitoring - Monthly Report for the June 7, 1995 survey for American Steel Foundries.

Mr. John Palmer, Ohio EPA acknowledged receipt of the June 13, 1995 submittal in a letter to Ms. B. M. Wellman from American Steel Foundries in a June 15, 1995 letter.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

- 1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."
- 5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.
- 6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In an April 4, 1995 letter subtitled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's March 6, 1995 letter to Ms. B. M. Wellman that requested comments from the June 1994 sampling event report.

Mr. Palmer from the Ohio EPA acknowledged receipt of the "1994 Interim Status Supplementary Annual Report Forms" in an April 20, 1995 letter to Ms. B. M. Wellman at American Steel Foundries.

In a May 26, 1995 letter Mr. T. C. Bradway from American Steel Foundries asked Mr. Joseph Amabeli, Waste water Treatment Coordinator, Alliance City Water Department for permission to discharge to the sanitary sewer purge and well development water from the March 1995 drilling and sampling event at the Sebring Landfill.

Mr. Amabeli granted permission to discharge the purge and development water from the March 1995 event in his June 2, 1995 response to the May 26, 1995 request.

The semiannual groundwater monitoring well sampling report is currently being reviewed for submittal in the very near future.

The next sampling event is tentatively scheduled for the week of September 18, 1995.

TEST RESULTS AND SAMPLING SUMMARY

American Steel Foundries plans to monitor each load of EAF dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

J. F. Oesch PLANT MANAGER

TCB Attachment

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: REB

BMW

PFF

RML

RBR

Ohio EPA

Z 055 522 326

Chief, Division of Solid and Hazardous Waste

1800 WaterMark Drive

P.O. Box 1049

Columbus, Ohio 43268-0149

Ohio EPA

Z 055 522 327

Division of Hazardous Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Ohio EPA

Z 055 522 328

Supervisor, division of Solid and Infectious Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.

Amsted Industries, Inc.

44th Floor - Boulevard Towers South

205 N. Michigan Ave.

Chicago, Illinois 60601

Mahoning County Health District

Chief, Solid Waste Program

2801 Market Street

Youngstown, Ohio 44507-1649

Attn: R. D. Setty

Z 055 522 329

C:\WP51\HAZWASTE\USVAMSTD.TB6

ATTACHMENT "A"

RESAMPLE SAMPLE ANALYSIS REQUEST FORM

ENVIRITE



	ERICAN STEEL	FOUNDRIE	S	
Generator Name: 10 Facility Address:	01 E. BROADWA	AY ST.	<u>. :</u>	
•	LIANCE	OHIO		44601
Stream Number:	City 1373		state Date Results Need	ded: ZIP
Waste Code: D0	06, D008 👯			EACH BOX
Volume:	··· 2			
	- * - *			
Generator's Description / Ide EA	entification of Waste F FURNACE DU			
D0	06, D008			
				•
Commonto				
Comments:				
<u>T</u> C	<u>'LP METALS ON</u>			
	WOTE NO 832			111
S.A.	MPLE NO. 033	012K	BOX NO.	114
Request Submitted by: _T.	C.BRADWAY	4 <u>e.</u>	Date Submitted:	3/30/95
CERTIFICATION:				
this document is represe	ntative. In the eve er and witness in th	ent that I per: ne spaces beli	sonally collected th	I the sample accompanying the sample, I have identified liected the sample, both the
Date of Sampling:	3/30/95		Time of Sampling	ComposiTR AM/PM
Sampler's Name:	т.с.	BRADWAY		-
Title and Affiliation of Samp	ler: <u>ENVIRONME</u>	NTAL MANA	GER, AMERICAN	STEEL FOUNDRIES
Sampler's Signature:	TICB	wood	N.	
Witness's Name:				
Title and Affiliation of Witne	ss: RECTO SAM	PlE 3-30	-45 x KA	~ MALK
Witness's Signature:		13		
ENVCHCDY.EAF		,		

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 04/11/95

Envirite Waste ID#: CS1373

Sample Collection Date: 03/30/95 Date Analysis Completed: 04/04/95

Waste Description: EAF Furnace Dust

BOX #: 116

Parameter	Results
pH (TCLP)	6.6 S.U.
Total CN (As Received)	0.53 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	7.8 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	5.0 mg/L
TCLP Mercury	<0.008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.020 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

QA/RC/Coordinator

cc: File TSR:

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801



RESAMPLE				EN
SAMPLE				
ANALYSIS				
REQUEST				
FORM				
		-		
	AMERICAN	STEEL	FOUNDRIES	

Generator Name:	1001 5 5555	. O.T.			
Facility Address:	1001 E. BROADWAY	ST.			
	ALLIANCE	OHIO	&*************************************	4460	
Stream Number:	CS1373	Date	state e Results Neede	ed: TO 10 DAY	ZIP YS
Waste Code:	D006, D008			EACH BOX	
Volume:					
Generator's Description	n / Identification of Waste: EAF FURNACE DUST	Ĺ			
****	D006, D008				
Comments:					
	TCLP METALS ONLY	Υ			
		-			
	SAMPLE NO. 0628	95 A	BOX NO. 11	5	
Request Submitted by	T.C.BRADWAY	Date	e Submitted: _	6/28/95	
CERTIFICATION:			•		
this document is rep myself as both the sa	esignated the location po presentative. In the even ampler and witness in the are correctly identified b	t that I personally spaces below. If	v collected the	sample. I have	Identified
Date of Sampling:	6/28/95	Tim	e of Sampling:	-omposite	AM/PM
Sampler's Name:	T.C.B	RADWAY			
Title and Affiliation of	Sampler: <u>ENVIRONMEN</u>	TAL MANAGER,	AMERICAN S	TEEL FOUNDRI	ES
Sampler's Signature:	T.C. Brod	way			
Witness's Name:					
Title and Affiliation of					
Witness's Signature:	RECID SAM	PE BOX 11	5 6-28-9	5 \$10	
ENVCHCDY.EAF	- $ -$	MCDC		RELIO 6-259	5
Plea:	se submit sample promptly.	Organic analyses	must be comp.	leted within	

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

Recycled Paper

RESAMPLE SAMPLE ANALYSIS REQUEST FORM



Generator Name:	AMERICAN STEEI	L FOUNDRIE:	S	
Facility Address:	1001 E. BROADV	VAY ST.		
,	ALLIANCE	OHIO		44601
Stream Number:	City CS1373		State Date Results Need	ZIP TO 10 DAYS
Waste Code:	D006, D008		Frequency:	
Volume:	 .			
Generator's Description	on / Identification of Was EAF FURNACE DU			
	D006, D008		•	
Comments:				
Comments.	TCLP METALS OF	NIT V		
 		IV i.i I		
-	SAMPLE NO. 06	0795 R	BOX NO.	116
Request Submitted by	y: T.C.BRADWAY	OFFICIAL STATE OF THE STATE OF	Date Submitted:	6/7/95
CERTIFICATION:				
I certify that I have of this document is re myself as both the s	presentative. In the events of the event of the events of the events of the event of the events of the events of the event of t	vent that I per the spaces belo	sonally collected th	the sample accompanyin e sample, I have identifie lected the sample, both th
Date of Sampling:	6/7/93	<u> </u>	Time of Sampling:	Composite AM/PI
Sampler's Name:	T.C	.BRADWAY	A	
Title and Affiliation of	Sampler: ENVIRONM	ENTAL MANA	GER, AMERICAN :	STEEL FOUNDRIES
Sampler's Signature:	WCB-	Sout		
Witness's Name:		(-	<u> </u>	
Title and Affiliation of	Witness: RECIP	SAMPLE	6/7/95 S	<u> </u>
Witness's Signature:	_ Set	m. ww	ti En	ViritE Corp

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVCHCDY.EAF

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 06/16/95 Envirite Waste ID#: CS1373 Sample Collection Date: 06/07/95 Date Analysis Completed: 06/12/95

Waste Description: EAF Furnace Dust

BOX #: 116

Parameter	Results
pH (TCLP)	6.6 S.U.
Total CN (As Received)	0.52 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.4 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	5.5 mg/L
TCLP Mercury	0.0064 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirte makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Chylinan Gaukens
QA/RC/Coordinator

cc: File

FAX	#Pages - 1	From: CHERYL HAWKINS	
TO: TERRY BRADWAY		ENVIRITE CORPORATION	
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238	
FAX#: 216-821-4568		FAX#: 216-456-2801	

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street

Alliance, Ohio 44601

Report Date: 06/01/95 Envirite Waste ID#: CS1373 Sample Collection Date: 05/24/95
Date Analysis Completed: 05/30/95

Waste Description: EAF Furnace Dust

BOX #: 111

Parameter	Results
pH (TCLP)	6.5
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.9 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	12.0 mg/L
TCLP Mercury	0.0062 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

LANGE COORDINATOR

cc: File TSR: tmc

FAX 6/1/95	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801

RESAMPLE SAMPLE ANALYSIS REQUEST FORM

CORPORATION

Generator Name:	AMERICAN STE		S	
Facility Address:	1001 E. BROA	DWAY ST.		, mestala
	ALLIANCE	OHIO		44601
Stream Number:	CS1373		State Date Results Nee	ded: TO 10 DAYS
Waste Code:	D006, D008			EACH BOX
Volume:				
Generator's Description	on / Identification of Wi EAF FURNACE			
	D006, D008			
Comments:	TCLP METALS SAMPLE NO. 5		BOX NO.	
Request Submitted b	y: T.C.BRADWAY	4		5/24/95
CERTIFICATION:				
myself as both the s	designated the location depresentative. In the sampler and witness is are correctly identified.	n the spaces bel	mple collection an sonally collected t ow. If I have not co	d the sample accompanying he sample, I have identified ollected the sample, both the
Date of Sampling:	5/24/0	15.	Time of Sampling	1: <u>Composite</u> AM/PA
Sampler's Name:	Т.	C.BRADWAY	···	
Title and Affiliation of	Sampler: <u>ENVIRO</u>	MENTAL MANA	GER, AMERICAN	STEEL FOUNDRIES
Sampler's Signature:	J. C. S.	Elec E	L.L	
Witness's Name:			<u> </u>	
Title and Affiliation of	Witness: RCD	SAMPLE 5/24	195 JB 87	
Witness's Signature:	XX	ohis	MIM	

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVCHCDY.EAF

RESAMPLE SAMPLE ANALYSIS REQUEST FORM



Generator Name:	AMERICAN STEED	L FOUNDRIES	5	
Facility Address:	1001 E. BROAD	WAY ST.		
	ALLIANCE	OHIO	Addition of the second of the	44601
Stream Number:	City CS1373		State Date Results Needed:	TO 10 DAYS
Waste Code:	D006, D008	derligen B. B. P. Villeder von J. B. Bregger wir der ergen von der Schaffen (H. B.	Frequency:	
Volume:			rioquonoy.	
Generator's Descriptio	n / Identification of Was EAF FURNACE D			
	D006, D008		D. 7. 7. 7	
Comments:				.
<u> </u>	TCLP METALS O	NLY		
	SAMPLE NO.05	0595 AA	BOX NO.	115
Request Submitted by	T.C.BRADWAY		Date Submitted:	5/95
CERTIFICATION:				
this document is remarked myself as both the s	lesignated the location presentative. In the eampler and witness in a are correctly identifie	vent that I pers the spaces belo	mple collection and the sonally collected the sow. If I have not collected	e sample accompanying ample, I have identified ted the sample, both the
Date of Sampling:	5/5/95		Time of Sampling:	
Sampler's Name:	T.C	.BRADWAY		
Title and Affiliation of	Sampler: <u>ENVIRONM</u>	MENTAL MANA	GER, AMERICAN STI	CEL FOUNDRIES
Sampler's Signature:	7,09	mobin E	~	
Witness's Name:				
Title and Affiliation of	Witness: RECD	SAMPLE	5/5/95 x	im a Ulh
Witness's Signature:		75 19		
ENVCHCDY.EAF				

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



TO



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Onio 44601

Report Date: 05/16/95 Envirite Waste ID#: CS1373 Sample Collection Date: 05/05/95 Date Analysis Completed: 05/11/95

Waste Description: EAF Furnace Dust

115 BOX #:

Results
7.3 S.U.
1.0 mg/kg
<0.0077 mg/L
<1.6 mg/L
5.6 mg/L
0.14 mg/L
4.9 mg/L
0.0031 mg/L
<0.30 mg/L
<0.0080 mg/L
<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

File CC:

FAX #	Pages - 1	From: CHERYL HAWKINS	
TO: TERRY BRADWAY		ENVIRITE CORPORATION	
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238	
FAX#: 216-821-4568		FAX#; 216-456-2801	

RESAMPLE



SAMPLE **ANALYSIS** REQUEST **FORM**

0	AMERICAN STE	EL FOUNDRIE	ES		
Generator Name: Facility Address:	1001 E. BROAL	DWAY ST.			
racility Address.	ALLIANCE	OHIO		4460	01
Stream Number:	CS1373		State Date Results Neede	7 TO 10 DA	ZIP AYS
Waste Code:	D006, D008		Frequency:		
Volume:					
Generator's Description	/ Identification of Wa				
	D006, D008				
0					
Comments:	COLD MEDALC	ONT			
	TCLP METALS	-UNI-Y	and the second section of the section of t		
	SAMPLE NO.	41895A	BOX NO.	123	
Request Submitted by:	T.C.BRADWAY		Date Submitted:	+ 18195	
CERTIFICATION:					
this document is repr	resentative. In the moler and witness is	event that I pe in the spaces be	sample collection and tersonally collected the elow. If I have not colle	sample, I have	identified
Date of Sampling:	4/12	195	Time of Sampling:	Compi	AM/PM
Sampler's Name:	<u>T.</u>	.C.BRADWAY			
Title and Affiliation of S	Sampler: <u>ENVIRON</u>	MENTAL MAN	AGER, AMERICAN S	TEEL FOUNDR	IES
Sampler's Signature:	Aci	e Lands	- Die		
Witness's Name:					- 131
Title and Affiliation of V	Vitness: <u>RECID</u> S	SAMPLE 4-1	18-95 X 95	n ql	1 M5
Witness's Signature:		7	SB	-	
באווירטרטע באב		V			

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 05/02/95 Envirite Waste ID#: CS1373

Sample Collection Date: 04/18/95 Date Analysis Completed: 04/24/95

Waste Description: EAF Furnace Dust

BOX #: 123

Results
6.5 S.U.
0.51 mg/kg
<0.0077 mg/L
<1.6 mg/L
9.8 mg/L
1.4 mg/L
1.8 mg/L
0.0029 mg/L
2.0 mg/L
<0.0080 mg/L
<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

QA/RC goordinator

cc: File

FAX #Pages - 1		From: CHERYL HAWKINS	
TO: TERRY BRADWAY		ENVIRITE CORPORATION	
CO: AMERICAN STEEEL FOUND.		Phone: 216-456-6238	
FAX#: 216-821-4568		FAX#: 216-456-2801	



1902 American Steel Foundries 1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150

FAX NO. (216) 821-4568

MAY 3 0 1995

JOHN OESCH PLANT MANAGER

May 10, 1995

OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

CERTIFIED LETTER RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, HRE-8J U.S. EPA, Region V 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Barbara Mazur

Z 055 522 302

Chief, SWERB Section V Office of Regional Counsel U.S. EPA Region V, 5CS-TUB3 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Richard Clarizio Z 055 522 303

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

ELECTRIC ARC FURNACE BAGHOUSE UNIT CLOSURE CERTIFICATION REPORT

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

TREATMENT, STORAGE C. ALLIANCE FACILITY AND DISPOSAL REQUIREMENTS

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U. S. EPA, a Alliance Post-Closure Plan in accordance with the requirements of 40 C.F.R. ## 265.117 through 265.120 and Ohio Admin. Code ##3745-66-17 through 20. If the Ohio EPA does not approve the Alliance Post-Closure Plan, Defendant shall submit to Ohio EPA, with copy to U. S. EPA, a revised or modified Alliance Post-Closure Plan, in accordance with 40 C.F.R. # 265.118(d) (4) and (f) and Ohio Admin. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

Please find enclosed the Closure Certification Statement and Report for the Electric Arc Furnace (EAF) Baghouse Closure at the American Steel Foundries facility, located in Alliance, Ohio. ASF believes that this closure is protective of human health and the environment. The extent of contamination, both areal and vertical have been determined and contaminated soils have been removed to the extent practicable. Closure was completed with the placement of clean backfill in the excavation and construction of a concrete pad on the ground surface. The placement of the concrete will minimize the infiltration of surface water into the former excavation, thus minimizing potential for migration of any remaining hazardous waste constituents. Further, routes for dermal, ingestion and inhalation exposure have been eliminated.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

BMW

Yours very truly,

J. F. Oesch
PLANT MANAGER

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW

JW

REB

RML

RBR

Ohio EPA

Z 055 522 304

Chief, Division of Hazardous Waste Management

1800 WaterMark Drive

P.O. Box 1049

Columbus, Ohio 43268-0149

Ohio EPA

Z 055 522 305

Division of Hazardous Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Ohio EPA

Z 055 522 306

Supervisor, division of Solid and Infectious Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.

Amsted Industries, Inc.

44th Floor - Boulevard Towers South

205 N. Michigan Ave.

Chicago, Illinois 60601

Mahoning County Health District

Chief, Solid Waste Program

2801 Market Street

Youngstown, Ohio 44507-1649

Attn: R.D.Setty

Z 055 522 307



American Steel Foundries

1001 EAST BROADWAY · ALLIANCE, OHIO 44601 · (216) \$23-6150 G FAX NO. (216) 821-4568

April 04, 1995



OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

CERTIFIED LETTER RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, HRE-8J U.S. EPA, Region V 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Barbara Mazur

Chief, SWERB Section V Office of Regional Counsel U.S. EPA Region V, 5CS-TUB3 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Richard Clarizio Z 055 522 279

Z 055 522 278

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

Progress Report # 12

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R.# 265.118 (d) (4) and (f) and Ohio Admin.. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

Closure of the Electric Arc Furnace Baghouse Waste Management Unit was undertaken during our plant vacation shutdown in the first two weeks of August 1994. Excavation was performed to the base of the foundations in the entire unit in order to attempt clean closure. A concrete slab was poured over the back filled excavation during the third week of August and a documentation of closure was prepared for submittal in early October.

In accordance with Mr. John Palmer's instructions to Ms. Bernadette Wellman at ASF, a Closure Certification Report has been prepared in accordance with Ohio Administrative Code and the most recent RCRA Closure Guidance Document in addition to the EAF Closure Activity Report submitted on October 12, 1994. The document is currently undergoing final review prior to submittal.

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4)

In a December 09, 1994 letter, Mr. John Oesch, Plant Manager, American Steel Foundries, formally submitted the new Sebring Landfill Closure Plan.

Mr. John Oesch, Plant Manager, American Steel Foundries, formally submitted the new Sebring Landfill Closure Plan Closure Cost Estimate in a December 16, 1994 letter.

In a December 19, 1994 letter, Mr. John Oesch, Plant Manager, American Steel Foundries, formally submitted the Surcharge and Settlement Monitoring Plan for the new Sebring Landfill.

On January 20, 1995 Mr. John Palmer, Environmental Specialist, Ohio EPA, acknowledged receipt of the Landfill Closure Plan in a letter to Mr. Terry Bradway, Environmental Manager, American Steel Foundries.

On January 12, 1995 a progress review meeting was held at the Ohio EPA Northeast District Office in Twinsburg, Ohio. ASF requested the meeting to discuss the progress in all areas of concern in the Consent Decree and Ohio Consent Order. Those in attending included Mr. John Palmer from Ohio EPA, Ms. B. M. Wellman and Mr. T. C. Bradway from American Steel Foundries.

A revision to Schedule 3.6, page 18 of the Landfill Closure Plan, was submitted with a January 20, 1995 letter from Mr. John Oesch, Plant Manager, American Steel Foundries.

On February 09, 1995 construction work for the initial phase of the Surcharge and Settlement Plan was begun at the Sebring Landfill.

On February 22, 1995 Mr. John Palmer and Mr. Eric Adams visited the Sebring Landfill to view the initial construction phase of the Surcharge and Settlement Plan activity and to review the proposed locations of the additional monitoring wells.

As an attachment to a February 27, 1995 letter, Mr. John Oesch, Plant Manager, American Steel Foundries, submitted a February 1995 revision of the Surcharge and Settlement Plan for Ohio EPA review.

On March 04, 1995 the initial phase of the construction work for the Surcharge and Settlement Plan was completed at the Sebring Landfill.

In a March 07, 1995 correspondence from Mr. John Palmer, Environmental Specialist, Ohio EPA, to Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, John asked for clarification of details for the Sebring Landfill Surcharge and Settlement Plan.

On March 27, 1995 in a letter to Mr. John Palmer, Ohio EPA, Northeast District Office, Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries responded to Mr. John Palmer's request for clarification of details.

Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries, responded to Mr. John Palmer's March 7, 1995 correspondence of concerns in a March 27, 1995 letter.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

- 1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."
- 3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a

Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

- 4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.
- 5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.
- 6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In a December 05, 1994 Letter subtitled "Sampling Report No. 4" from Mr. John Oesch, Plant Manager, American Steel Foundries submitted the sampling report for the September 14 and 15, 1994 sampling of the groundwater monitoring wells at the Sebring Landfill.

The City of Alliance Department of Waste Water Treatment gave ASF approval to discharge to the sanitary sewer purge water from the September 1994 sampling of ground water sampling wells at the Sebring Landfill in a December 13, 1994 letter from Joseph Amabeli, Wastewater Coordinator to Terry Bradway.

In a December 19, 1994 letter titled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's November 23, 1994 letter covering the "1993 Supplementary Annual Report" notice of deficiencies.

In a December 21, 1994 letter titled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's November 23, 1994 letter covering the June 28, 1994 notice of deficiencies from Mr. John Palmer, Ohio EPA.

Mr. John Palmer Acknowledged receipt of documents addressing ground water issues in a December 27, 1994 correspondence to Mr. T. C. Bradway.

A copy of the Groundwater Quality Assessment for the Sebring Facility was included as an appendix of the New Landfill Closure Plan that was submitted by Mr. John F. Oesch's letter of December 09, 1994. The document has been revised to reflect changes requested in both of Mr. John Palmer's letters of November 23, 1994. The revised document was submitted in a January 06, 1995 letter by Mr. John F. Oesch, Plant Manager, American Steel Foundries.

In a January 17, 1995 letter from Mr. John Palmer, Environmental Specialist, Ohio EPA to Ms. B. M. Wellman, Manager of Environmental Affairs, American Steel Foundries the Ohio EPA acknowledged receipt of the Ground Water Quality Assessment Plan.

In a February 14, 1995 letter, Mr. John Palmer formally informed Ms. Wellman that the Ohio EPA was going to perform a "Comprehensive Ground Water Monitoring Evaluation" during our next well sampling event on March 21, 1995.

Messrs. John Palmer and Eric Adams of the Ohio EPA gave approval for new well locations in accordance with the Proposed Groundwater Sampling Plan during a telephone conversation on February 17, 1995 with Terry Bradway from ASF.

In a February 28, 1995 letter, Mr. John F. Oesch, Plant Manager, American Steel Foundries submitted a copy of the GRITS/STAT data a potentiometric map in accordance with Mr. John Palmer's June 28, 1994 evaluation of groundwater data submission from his letter of December 27, 1994.

On March 06, 1995 Mr. John Palmer, Ohio EPA acknowledged receipt of the February 28, 1995 submittals in a letter to Ms. B. M. Wellman.

Mr. John Palmer from the Northeast District Office of the Ohio EPA responded to the June 15 through 17 sampling event of the ground water monitoring wells in a March 06, 1995 letter to Ms. B. M. Wellman at American Steel Foundries.

The next sampling event is tentatively scheduled for the week of September 18, 1995.

TEST RESULTS AND SAMPLING SUMMARY

American Steel Foundries plans to monitor each load of EAF dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

The following waste streams were recently sampled and are reported as attachment "B":

- 1. Spent Foundry Sand
- 2. Floor Sweepings
- 3. Refractory Brick
- 4. Broken Core Butts
- 5. Dewatered Clarifier Sludge
- 6. Broken Flourescent Light Bulbs
- 7. Kerosene, Diesel Fuel and Oil
- 8. Water & Oil
- 9. Mineral Spirits, Coolant and Water
- 10. Waste Oil

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

J. F!\Oesch
PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW

> JW RML RBR

Ohio EPA 2 055 522 280

Chief, Division of Solid and Hazardous Waste

1800 WaterMark Drive

P.O. Box 1049 \

Columbus, Ohio 43268-0149

Z 055 522 281 Ohio EPA

Division of Hazardous Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Ohio EPA **Z** 055 522 282

Supervisor, division of Solid and Infectious Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.

Amsted Industries, Inc.

44th Floor - Boulevard Towers South

205 N. Michigan Ave.

Chicago, Illinois 60601

P. C. Schillawski

Z 055 522 283

Z 055 522 284

Squire Sanders & Dempsey

4900 Society Center

127 Public Square

Cleveland, Ohio 44114-1304

Mahoning County Health District

Chief, Solid Waste Program

2801 Market Street

Youngstown, Ohio 44507-1649

Attn: R.D.Setty

C:\WP51\HAZWASTE\USVAMSTD.TB5



RESAMPLE SAMPLE ANALYSIS REQUEST FORM

ENVIRITE CORPORATION

O	AMERICAN STEE	EL FOUNDRIE	S	
Generator Name: Facility Address:	1001 E. BROAL	DWAY ST.		
radiity Address.	ALLIANCE	OHIO		44601
Stream Number:	CS1373	-	State Date Results Needed:	7 TO 10 DAYS
Waste Code:	D006, D008 3	-	Frequency:	EACH BOX
Volume:				
Generator's Description	on / Identification of Wa EAF FURNACE I			
	D006, D008			
Comments:	u			
Comments.	MOID MEMBIC	ONT 17		
•	TCLP METALS	:: <u>OM II X</u>	1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	
	SAMPLE NO. 03	5309SA	BOX NO. 1	16
Request Submitted b	y: T.C.BRADWAY	, ,	Date Submitted:	3/30/95
		•		
CERTIFICATION:		v		
this document is re myself as both the s	designated the locatio epresentative. In the sampler and witness in s are correctly identifi	event that I per the spaces bel	ample collection and the sonally collected the sollow. If I have not collected the sollow.	e sample accompanying ample, I have identified ted the sample, both the
Date of Sampling:	3/30/9	5	Time of Sampling: <u></u>	omposiTP_AM/PM
Sampler's Name:	T.	C.BRADWAY		
Title and Affiliation of	Sampler: <u>ENVIRON</u>	MENTAL MANA	GER, AMERICAN STE	CEL FOUNDRIES
Sampler's Signature:	7,CS	wood	, and	
Witness's Name:				
Title and Affiliation of	Witness: RECID S	AMPLE 3-30	-95 x John	-MAK
Witness's Signature:		XV3		1
ENVCHCDY.EAF	\mathcal{L}	/		

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries

1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 03/23/95 Envirite Waste ID#: CS1373 Sample Collection Date: 03/16/95
Date Analysis Completed: 03/20/95

Waste Description: EAF Furnace Dust

BOX #: 117

<u>Parameter</u>	Results
pH (TCLP)	6.6 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.0 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	2.3 mg/L
TCLP Mercury	0.0026 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.010 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirte makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

QA/RC/Coordinator

CC: TSR:

File

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWAY		ENVIRITE CORPORATION
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238
FAX#: 216-821-4568		FAX#: 216-456-2801



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 03/07/95 Envirite Waste ID#: CS1373 Sample Collection Date: 02/28/95 Date Analysis Completed: 03/03/95

Waste Description: EAF Furnace Dust

111 BOX #:

Parameter	<u>Results</u>
pH (TCLP)	6.6 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.3 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	0.70 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	0.80 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the sultability of this analysis for any other use.

Analysis Approved by:

CC:

File TSR:

FAX #	Pages - 1	From: CHERYL HAWKINS	
TO: TERRY BRADWAY		ENVIRITE CORPORATION	
CO: AMERICAN STEEEL FOUND.		Phone: 216-456-6238	
FAX#: 216-821-4568		FAX#: 216-456-2801	

RESAMPLE SAMPLE ANALYSIS REQUEST FORM



Generator Name:	AMERICAN STEEL FOUNDRIES					
Facility Address:	1001 E. BROADWAY ST.					
	ALLIANCE	OHIO		44601		
Stream Number:	CS1373		State Date Results Neede	7 TO 10 DAYS		
Waste Code:	D006, D008		Frequency:			
Volume:						
Generator's Description	/ Identification of Wa					
	D006, D008					
Comments:		" " " " " " " " " " " " " " " " " " " 				
We control with a sub-line control of the control o	TCLP METALS	ONLY				
	SAMPLE NO. 03	2895 A	BOX NO.	111		
Request Submitted by:	T.C.BRADWAY		Date Submitted: _3	2/28/95		
CERTIFICATION:						
this document is repr	resentative. In the mpler and witness ir	event that I pers the spaces belo	sonally collected the	he sample accompanying sample, I have Identified ected the sample, both the		
Date of Sampling:	2/28	195	Time of Sampling:	Composite AM/PM		
Sampler's Name:	T.	C.BRADWAY				
Title and Affiliation of S	ampler: <u>ENVIRO</u> N	MENTAL MANA	GER, AMERICAN S	TEEL FOUNDRIES		
Sampler's Signature:	D'C'	Braden	- W			
Witness's Name:						
Title and Affiliation of V	Vitness:					
Witness's Signature:		, A				
ENVCHCDY.EAF	C/oh	a. M.	DIII			

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 02/08/95 Envirite Waste ID#: CS1373 Sample Collection Date: 02/03/95 Date Analysis Completed: 02/07/95

Waste Description: EAF Furnace Dust

BOX #: 117

Parameter	<u>Results</u>
рН (тсцэ)	6.5 S.U.
Total CN (As Received)	1.1 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.8 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	3.24 mg/L
TCLP Mercury	0.0050 mg/L
TCLP Nickel	<0.10 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirte facilities. Envirte makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

A/RC/Coordinator

cc: TSR: File

FAX #Pages - 1		From: CHERYL HAWKINS		
TO: TERRY BRADWAY CO: AMERICAN STEEEL FOUND.		ENVIRITE CORPORATION		
		Phone: 216-456-6238		
FAX#: 216-821-4568		FAX#: 216-456-2801		

RESAMPLE SAMPLE ANALYSIS REQUEST FORM



Canavatay Mana	AMERICAN STE	EL FOUNDRIES	5		
Generator Name: Facility Address:	1001 E. BROA	DWAY ST.		 	
racinty Address.	ALLIANCE	OHIO	- MARINE	4460	1
Stream Number:	CS1373		State Date Results Nee	ded: ⁷ TO 10 DA	zip YS
Waste Code:	D006, D008		Frequency:	EACH BOX	
Volume:					
Generator's Descript	ion / Identification of W EAF FURNACE				
	D006, D008				
Comments					
Comments:					
	TCLP METALS	ONLY		•	
	SAMPLE NO. O	20395A	BOX NO.	117	
Request Submitted to	by: T.C.BRADWAY		Date Submitted:	2/3/95	
CERTIFICATION:					
I certify that I have this document is r myself as both the	designated the location designated the location design and witness is are correctly identi	in the spaces belo	mple collection an sonally collected t bw. If I have not co	d the sample accor he sample, I have ollected the sample	mpanying Identified , both the
Date of Sampling:	2/3/9	5.	Time of Sampling	J: Composite	AM/PM
Sampler's Name:	<u>T</u>	.C.BRADWAY		·	
Title and Affiliation of	of Sampler: _ENVIROR	MENTAL MANA	GER, AMERICAN	STEEL FOUNDRI	ES
Sampler's Signature	5.0.P	mellin			
Witness's Name:		(1111
Title and Affiliation of	of Witness: REUD S	AMP/E 2/3/95	X/falu	~ AMW	U
Witness's Signature	: <u> </u>	why 2-3-95			
ENVCHCDY.EAF	'	\circ			

ary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: February 21, 1995 Envirite Waste ID#: CS1373 Sample Collection Date: 02/15/95 Date Analysis Completed: 02/19/95

Waste Description: EAF Furnace Dust

BOX #: 116

Parameter	<u>Results</u>
рН (ТСLР)	6.5 S.U.
Total CN (As Received)	0.51 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	0.32 mg/L
TCLP Chromium	0.18 mg/L
TCLP Lead	<0.64 mg/L
TCLP Mercury	0.0021 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other, use.

Analysis Approved by:

DA/RC Coordinator

cc:

File

TSR:

FAX #Pages - 1		From: CHERYL HAWKINS		
TO: TERRY BRADWAY		ENVIRITE CORPORATION		
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238		
FAX#: 216-821-4568		FAX#: 216-456-2801		

RESAMPLE SAMPLE ANALYSIS REQUEST FORM

CORPORATION

Generator Name:	AMERICAN STE	EL FOUNDRIE:	S	
Facility Address:	1001 E. BROA	DWAY ST.		
, ,	ALLIANCE	OHIO		44601
Stream Number:	CS1373		State Date Results Nee	7 TO 10 DAYS
Waste Code:	D006, D008			EACH BOX
Volume:				
Generator's Description	n / Identification of Wi EAF FURNACE			
	D006, D008			
Comments:				- CANADA AND AND AND AND AND AND AND AND AN
	TCLP METALS	ONLY		
	SAMPLE NO. C	121595A	BOX NO.	116
Request Submitted by:	T.C.BRADWAY		Date Submitted:	2/15/95
CERTIFICATION:				
I certify that I have do this document is rep myself as both the sa sampler and witness	resentative. In the impler and witness i	event that I person the spaces below	mple collection an sonally collected t ow. If I have not co	d the sample accompanying he sample, I have identified ollected the sample, both the
Date of Sampling:	2/15/9	5.	Time of Sampling	: RDMODSITEAM/PA
Sampler's Name:	<u> </u>	C.BRADWAY		, ,
Title and Affiliation of S	Sampler: <u>ENVIRO</u>	IMENTAL MANA	CER, AMERICAN	STEEL FOUNDRIES
Sampler's Signature:	T.C.P	andere		****
Witness's Name:				
Title and Affiliation of	Witness: RECID	2-15-95	-/lo-lw01	Mille
Witness's Signature:		ξ		

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVCHCDY.EAF



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street

Alliance, Ohio 44601

Report Date: 01/24/95 Envirite Waste ID#: CS1373 Sample Collection Date: 01/19/95 Date Analysis Completed: 01/23/95

Waste Description: EAF Furnace Dust B

BOX #: 111

<u>Parameter</u>	Results
pH (TCLP)	6.6
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.2 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	5.9 mg/L
TCLP Mercury	0.0025 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

A/RC Coordinator

cc: File

FAX #Pages - 1		From: CHERYL HAWKINS		
TO: TERRY BRADWAY		ENVIRITE CORPORATION		
CO: AMERICAN STEEEL FOUND.		Phone: 216-456-6238		
FAX#: 216-821-4568		FAX#: 216-456-2801		

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 01/11/95 Envirite Waste ID#: CS1373 Sample Collection Date: 12/28/94 Date Analysis Completed: 01/06/95

116

Waste Description: EAF Furnace Dust BOX #:

Parameter	Results
рН (ТССР)	6.6
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.2 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	2.0 mg/L
TCLP Mercury	0.0014 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

QA/RC/Coordinator

cc: File TSR: tmc

FAX #Pages - 1		From: CHERYL HAWKINS		
TO: TERRY BRADWAY		ENVIRITE CORPORATION		
CO: AMERICAN STEEEL FOUND.		Phone: 216-456-6238		
FAX#: 216-821-4568		FAX#: 216-456-2801		

RESAMPLE SAMPLE **ANALYSIS REQUEST FORM**



Consiste a Norman	AMERICAN STE	EL FOUNDRIES	3	
Generator Name: Facility Address:	1001 E. BROA	DWAY ST.		
racility Address.	ALLIANCE	OHIO		44601
Stream Number:	CS1373		State Date Results Needed	<i>ZP</i> 37 TO 10 DAYS
Waste Code:	D006, D008		Frequency:	
Volume:	-			
Generator's Descriptio	n / Identification of W EAF FURNACE			
W-10-11-11-11-11-11-11-11-11-11-11-11-11-	D006, D008			
Commente		VIII VIII VIII VIII VIII VIII VIII VII	· · · · · · · · · · · · · · · · · · ·	
Comments:	TCLP METALS	ONT V		
	SAMPLE NO. 1	22894 A	BOX NO. 1	16
Request Submitted by	T.C.BRADWAY		Date Submitted: 1	2/23/94
CERTIFICATION:				
this document is re-	presentative. In the ampler and witness	e event that I pers in the spaces belo	sonally collected the	ne sample accompanying sample, I have identified cted the sample, both the
Date of Sampling:	12/23/	qý	Time of Sampling: (ComposiTR AM/PN
Sampler's Name:	<u></u>	.C.BRADWAY		}
Title and Affiliation of	Sampler: <u>ENVIRO</u>	NMENTAL MANAC	SER, AMERICAN ST	PEEL FOUNDRIES
Sampler's Signature:	75	man B.	7	
Witness's Name:	1 on	I wil	<u> </u>	
Title and Affiliation of	Witness:			
Witness's Signature:				
ENVCHCDY.EAF				

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries

1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 12/22/94 Envirite Waste ID#: CS1373 Sample Collection Date: 12/16/94 Date Analysis Completed: 12/20/94

Waste Description: EAF Furnace Dust

BOX #: 142

<u>Parameter</u>	Results
pH (TCLP)	6.4
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.5 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	<0.16 mg/L
TCLP Mercury	0.0042 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.010 mg/L
TCLP Silver	0.40 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

(<u>) LUWE) YWY LUWYLWO</u> QA/RØ Coordinator

cc: File TSR: trnc

FAX #Pages - 1		From: CHERYL HAWKINS		
TO: TERRY BRADWAY		ENVIRITE CORPORATION		
CO: AMERICAN STEEEL FOUND.		Phone: 216-456-6238		
FAX#: 216-821-4568		FAX#: 216-456-2801		

12/16/94 13:21

RECEIVED DEC 16 1994 6 10:42

CORPORATION

RESAMPLE SAMPLE ANALYSIS REQUEST **FORM**

	AMERICAN STEEL FO	UNDRIES		
Senerator Name: Facility Address:	1001 E. BROADWAY	ST.		E- 72
acinty Accides.	ALLIANCE	OHIO	COMPANIES OF THE PROPERTY OF T	44601
Stream Number:	CS1373	Sian Date Resu	, 7 TO 1	O DAYS
Waste Code:	D006, D008		EACH	
Volume:		<u>_</u>		
Generator's Description	/ Identification of Waste: EAF FURNACE DUST			
	D006, D008			
Comments:				
	TCLP METALS ONLY		Stewarton	
	- Alexander -			·
	SAMPLE NO.	BOX	NO. 143	>
Request Submitted by:	T.C.BRADWAY	Date Subn	nitted: 12/16	94
CERTIFICATION:				
certify that I have de his document is repi nyself as both the sai	signated the location point resentative. In the event ti mpler and witness in the sp are correctly identified belo	hat I personally colle aces below. If I have	cted the sample. I	have identified
Date of Sampling:	12/16/94	Time of Sa	mpling: <u>Co Mpo</u>	SITE AM/PM
Sampler's Name:	T.C.BRA	DWAY		
itle and Affiliation of S	ampler ENVIRONMENTA	L MANAGER, AMER	ICAN STEEL FOU	NDRIES
Sampler's Signature:	X To B.	- Alexander		
Vitness's Name:	916		17	
itle and Affiliation of W	Vitness: <u>RECEIVED B</u>	1 P.Cook 12	-16-94/5	uf lyes
Vitness's Signature:				, F
ENVCHCDY.EAF				

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



RESAMPLE SAMPLE ANALYSIS REQUEST FORM

CORPORATION

Computer Manage	AMERICAN STE	EL FOUNDRIE:	S	
Generator Name: Facility Address:	1001 E. BROAD	DWAY ST.		
radinty Address.	ALLIANCE	OHIO		44601
Stream Number:	CS1373		State Date Results Nee	7 TO 10 DAYS
Waste Code:	D006, D008			EACH BOX
Volume:				
Generator's Description	on / Identification of Wa			
	D006, D008			
· · · · · · · · · · · · · · · · · · ·				
Comments:				
	TCLP METALS	ONLY		
	SAMPLE NO.	and prompted to the continue of the continue o	BOX NO.	142
Request Submitted by	y: T.C.BRADWAY		Date Submitted:	12/16/94
CERTIFICATION:				
this document is re myself as both the s	presentative. In the	event that I pers n the spaces belo	sonally collected the	d the sample accompanying he sample, I have identified ollected the sample, both the
Date of Sampling:	12/16	194	Time of Sampling	: Composite AM/PM
Sampler's Name:	<u>T.</u>	C.BRADWAY		
Title and Affiliation of	Sampler: ENVIRON	IMENTAL MANA	GER, AMERICAN	STEEL FOUNDRIES
Sampler's Signature:				
Witness's Name:	SB			
Title and Affiliation of	Witness: RECEIVE	DBY P.Co	OK 12-16-95	+ Gant land
Witness's Signature:				
ENVCHCDY.EAF				

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries

1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 12/08/94 Envirite Waste ID#: CS1373 Sample Collection Date: 11/28/94 Date Analysis Completed: 12/06/94

Waste Description: EAF Furnace Dust

BOX #: 120

Parameter	<u>Results</u>
рН (ТССР)	6.7 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.1 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	1.7 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

DA/RO Coordinator

cc: File

FAX #Pages - 1		From: CHERYL HAWKINS		
TO: TERRY BRADWAY		ENVIRITE CORPORATION		
CO: AMERICAN STEEEL FOUND.		Phone: 216-456-6238		
FAX#: 216-821-4568		FAX#: 216-456-2801		



WASTE APPROVAL FORM

Date

: 12/15/94

BFI Location

: Willowcreek Landfill

BFI Initiator

: Casanta, Al

Generator

: American Steel Foundries

Generator Location: Alliance, OH

WCD Number

BFI Number

: AB51187

: 202144

WASTE DESCRIPTION:

Brick, Refractory

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility...

Glenwillow Landfill

Northern Ohio Landfill Willowcreek Landfill Ottawa Landfill Mahoning Landfill

COMMENTS:

WCD.updated December 2, 1994.

This waste has the potential to cause dusting problems.

The following items were received by the Corporate Waste Approval Group:

- a. Analytical data from DeYor MetPath Laboratories
- b. Chain of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217;218;219;220;855/960212/202144

Corporate Waste Approval Group

Diana in facts

Diana L. Lasco

Technical Representative



0H 217, 018, 919, 9100012, 200144 BFI WASTE CODE 500, 855

WASTE APPR	ROVAL REQUEST
	Action Requested: New Waste Approval Up-Date Approval - Previous Number: Disposal Site Requested: Company Number: Management Method Requested: Disposal Site Requested: Management Method Requested: Management
IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTA' INSTRUCTIONS BEFORE COMPLETING THIS FORM, THIS FORM IS LEGIBLY PRINTED IN INK, AND SIGNED.	TIVE OF THE WASTE GENERATOR. PLEASE READ THE
1. GENERAT	OR INFORMATION
a) Name/Description of The Waste: Spent Reference b) Process Generating Waste: C) Is this a treatment residue of a waste which was previously a restricted ff yes, describe the waste and the process generating the waste prior d) Is this a "Hazardous Waste" as defined by State, Provincial, or local R If yes, enter the Waste Identification Number if one has been assigned e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution"	d hazardous waste? Yes No to treatment. egulations? Yes No d:
MaYes □ No If yes, enter Waste Identification Number: □ N F Recommended personal protection equipment and special handling process.	
Other Per: Year Month XWeek Day	Cubic Yards 📆 Tons Gallons Cubic Meters Tonnes(metric) One Time Other Other
3. WASTE F	PROPERTIES AT 72°F
a) Physical State: Solid □ Semi-solid □ Powder □ Liquid □ Combination b) Layers: □ Single-layered □ Bi-layered □ Multi-layered c) Colors(s): □ Describe Troy Baaso + Black	e) Density Range:
Describe 1 1 1 2 3 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2	

BFI WASTE CODE

4. REACTIVITY		5. THIS WASTE CONTAINS		6. SPECIAL WASTE COMPOSITION
Note if the waste exhibits any of the following reactive properties: Water Reactive Acid Reactive Alkaline Reactive Oxidizer Autopolymerizable Pyrophoric Explosive Thermally Sensitive Shock Sensitive None of the above		Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6. □ Free Liquids □ OSHA Substances □ Etiological Agents □ Etiological Agents □ Pathogens □ Pathogens □ Biological Materials □ Dioxins □ Radioactive Materials □ Organic Solvents □ PCBs not regulated □ Virgin Oils □ Dioxins □ PCBs not regulated □ Used Oils □ None of the Above		Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary. Range Components KERACION BRICK 98% SLAG 1,5%
			-	
	-			
		7. TRANSPORTATION INFORMATI	ON	
If the waste is a DOT Hazardous Proper USDOT Shipping Name: USDOT Hazard Class:		terial, complete the following: NA UN or NA Number:		CERCLA Reportable Quantity:
		8_SUPPLEMENTAL INFORMATION		
S None ☐ MSD Sheets ☐ Other - describe:		☐ Analytical Data ☐ Chain of Custody		I Memo/Letter ☐ Waste CompositionNo. of Pages:
	3.4F	9. GENERATOR'S CERTIFICATION)N	
I hereby certify that the above ar deliberate or willful omissions of not a regulated hazardous waste contain PCBs regulated by TSC	nd a con e by A (i.	ttached description is complete and accurate to the inposition or properties exist, that all known or suspethe USEPA, by an applicable State or Provincial aute., 40 CFR 761) or any Provincial authority. NATORY as identified in Section 1 (c):	bes cted	nazards have been disclosed, and that the wasters
12-2-94 T.C.BRA	0		vu.	MANAGERAN LATGERLUGSI
		NT NAME SIGNATURE	2-	TITLE
The state of the s	7 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 - 2 -	REPRESENTATIVE SAMPLE CERTIFI		4
This Section is to be completed	by t	the person obtaining the sample of the above descrit	bed v	waste.
	-,			
I certify that the sample for which and preserved in a manner control.	:h ar	nalytical data was provided on the waste described a ent with accepted technical standards.	abov	e is representative of that waste and was collected .
I certify that the sample for which and preserved in a manner contact Lab sample assigned to:	:h ar	nalytical data was provided on the waste described a ent with accepted technical standards.		e is representative of that waste and was collected
Lab sample assigned to: Collector's Name: 7. C. S	ch ar siste	ent with accepted technical standards. (peel off la		e is representative of that waste and was collected
Lab sample assigned to: Collector's Name: T. C. Signature: T. C. S.	siste	ent with accepted technical standards. (peel off la		e is representative of that waste and was collected
and preserved in a manner constant Lab sample assigned to: Collector's Name: T. C. Signature: T. C. S. Company: Processor	sh ar	powers (peel off la		e is representative of that waste and was collected
Lab sample assigned to: Collector's Name: T. C. Signature: T. C. S.	sh ar	pent with accepted technical standards. (peel off language of the company of the		e is representative of that waste and was collected

74865453

TIME

355453

RECEIVED

12/02/94 HEPORTED

10:30

ERICAN STEEL FOUNDRIES

5453

DATE SAMPLED

12/02/94

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12/09/94

UNITS

MG/L Z

MG/L MG/L X

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MG/L X, MG/L ፈ

विकर्ण	
TCLP EXTRACTION PROC FINAL PH=5.82	
TCLP METALS & BIAS X	
ARSENIC S O.	Q 5.0
Spike recovery 112	
BARIUM (0.5 0.6	0 100.0
Spike recovery 103	
CADMIUM CO.05 O.(0 1.0
Spike recovery Mil 105	
CHROMIUM CO.OS O.(0 5.0
Spike recovery 92	
SELENIUM B (0.25 0.0	1.0
5pike recovery 84	•
MERCURY (0.002 0.0	5.0
Spike recovery E 107	
E LEAD 0.0	D 5.0
Spike recovery 100	
SILVER 0.0	5.0
5pike recovery 90	
TCLP SUPPL.METALS	
NICKEL 0.2	
Spike recovery 95	
COPPER <0.05	
Spike recovery 90	•
TCLP REVIEW	
TOP PREPARATION EDITIONS	

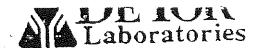
TCLP PREPARATION FOLLOWS METHOD 1311 5W-846 AS REVISED NOVEMBER 24,1992 (57FR55114) REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

- DIRECTORS ---Patrick K. Jaynes Ph.D. Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 385-3396

BFI WASTE SYSTEMS WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 ATWATER OΗ 44201



7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY BROWNING-FERRIS INDUSTRIES

	Location:	helellows	leek	www.in.	Client#	623	
	Billing Contr	al #(Lab use	aniy)	2755	rs0	rangungskowake.	
	_			78385			
	Purchase Or						
	Generator/P	_	American	, .			
	LAB ID#	86545	3/	WCD #	AB 611	87	
	Waste Desc	ription:	Kefrowse	×		- M. M	
	Number of	~	Solid	Multicha	CO	Organic/oil	
	Matrix	Soil	₹ Solid	iviQtGpna	2a	Organicy dit	
		REQUESTED			RUSH	Y N	
553		TCLP Extrac					
546			aca Extractio				
548			ike recoverie		- 0 htt=l=11	4	<i> </i>
244		_Supplement	al matala i a		or a mozan Disk Caris	i KA	i \$ 300.00
585			Panel (Metal		Rush Service	2)	
578		~	spike recaves				
582	2		es + spike rec		•		
581			erbicides + sp	jike recover	res		
1003	2	_Reactivity S	creen				
1003	3	_Carrosivity :	Screen				
859	9	lonitability					
51	i	Total Petrol	eum Hydroca	rbons(TPH)			
56	9	BETX					
50	2	PCB(soil)					
		Other					
24	5 X	Signatory R	eview	·			
							
Sample Ta	ken By:	,	Date	Time	Company		
7.6	Bu	2	12/2/91	10:30 Am	AMERI	14- STEEL	FOUNDAIRS
Sample Su	ibmitted 8y:		<i></i>				
			·				,
Sample Co	ouriered By:						
111	Es auth		12/2/44	4:20pm	BFI		
Sample Re	eceived 8v:		77.				
foru.	Winhera	,	112-2-94	14:30	DeYor L	aboratories	-
X .	1 1 1 C	W0.55.005		- F	1.K		



WASTE APPROVAL FORM

Date

: 12/15/94

BFI Location

: Willowcreek Landfill

BFI Initiator

: Casanta, Al

Generator

: American Steel Foundries

Generator Location: Alliance, OH

WCD Number

: AB51185

BFI Number

: 202143

WASTE DESCRIPTION: Floorsweepings

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility... Glenwillow Landfill Northern Ohio Landfill Willowcreek Landfill

Ottawa Landfill

COMMENTS:

WCD updated December 2, 1994.

This waste has the potential to cause dusting problems.

The following items were received by the Corporate Waste Approval Group:

- a. Analytical data from DeYor MetPath Laboratories
- b. Chain of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217;218;219;220/970212/202143

Corporate Waste Approval Group

Diana En Faster

Diana L. Lasco

Technical Representative



CH 3/1, 2/8 3/9, 970 3/2, 303/43
BFI WASTE CODE 550

WASTE APPR	OVAL REQUEST
3FI to complete this area. BFI Initiator: AI Casunta Location: Willow Creek / Wassillon Company Number: 2/9 6/1 Telephone: (2/6) 947-2548 Fax: (2/6) 947-2548 Date: Dec 2, 1994 WASTE CHARAC	Action Requested: New Waste Approval QUp-Date Approval - Previous Number: 202143 Disposal Site Requested: 217,218,219,220 Company Number: Management Method Requested: CTERIZATION DATA AL WASTE TIVE OF THE WASTE GENERATOR. PLEASE READ THE
1. GENERAT	OR INFORMATION
a) Generator's Name: AMERICAN STEEL FOUNDRIES b) Generating Facility's Address: 1001 E. Berroway ST. City: PILLIANCE State: DH Zip: 44L01 c) Generator's Representative: TFRRY C.BRROWAY Title: Environmental Manager Telephone: (21L) 823-6150 Ext 206 Fax: (21L) 821-4668 d) Emergency/Information Contact: Same AS ABOVE Title: Telephone: ()	e) State/Provincial/Local Registration No.: N/A Generator's EPA Id. No.: OHD981090 418 Industry Description/SIC Code: _3325 f) Customer's Name: g) Customer's Mailing Address: City: State: _Zip: h) Representative: Telephone: () Fax: ()
2 GENERAL WAST	E STREAM INFORMATION
c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to the distribution of the waste prior to the distribution of the waste prior to the distribution of the waste in the	egulations? Yes No I: Toontrol Waste" as defined by State, Provincial, or local Regulations?
3/	☐ Cubic Yards Thomas ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)
	One Time Other Other
3. WASTE F	PROPERTIES AT 72°F
a) Physical State: Solid Semi-solid Powder Liquid Combination b) Layers: Single-layered Bi-layered Multi-layered c) Colors(s): Describe	e) Density Range: ND to N/D □ lbs/gai. □ g./cc. □ lbs./yd.³ □ Kg/m³ □ Other f) Flash Point, °F: □ ≤ 72 □ 73-100 □ 101-140 □ 141-200 □ ≥ 201 □ N/A \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
d) Odor:	g) pH:
Describe Strong	$_$ $\Box \le 2 \Box 2.1 - 5.0 \Box 5.1 - 9.0 \Box 9.1 - 12.4 \Box \ge 12.5 \Box N/A \boxed{3} N/D$

BFI WASTE CODE

4. REACTIVITY	5. THIS WAS	STE CONTAINS	6. SPECIAL WASTE COM	POSITION
None of the above	If any are checked "Ye (if applicable) and incl		Concentration ranges are sugg must be identified in percentage parts per million (ppm). Attach a necessary. Components Sano Insulated Steers Scarp Steet Steet Garnonsis	es (%) and/or
	7. TRAN	SPORTATION INFORMATION		
If the waste is a DOT Hazardous Ma Proper USDOT Shipping Name:	A M		CERCLA Reportable Quantity:	
	8. SUP	PLEMENTAL INFORMATION	and the second of the second o	en se sitaes, fon trottport som e For experience respective
None	☐ Analytical Data		☐ Memo/Letter ☐ Waste Con No. of F	ages:
	g. GEN	IERATOR'S CERTIFICATION	THE PARTY OF THE P	斯斯斯斯 拉斯 2000
I hereby certify that the above and a deliberate or willful omissions of con not a regulated hazardous waste by contain PCBs regulated by TSCA (in GENERATOR'S AUTHORIZED SIG	mposition or properties ex the USEPA, by an applic .e., 40 CFR 761) or any F	kist, that all known or suspected cable State or Provincial author Provincial authority.	d hazards have been disclosed, and	that the waste is
12-2-94 T.C. BRAS	men	T.C.B. SIGNATURE	ENVIRONMENTAL MA	NACEL
DATE FO		TATIVE SAMPLE CERTIFICA		THE TOTAL PROPERTY OF THE PARTY
This Section is to be completed by I certify that the sample for which a and preserved in a manner consiste	nalytical data was provide	ed on the waste described above		nd was collected
Lab sample assigned to: Collector's Name:		(peel off label))	
Signature: T.C.B.	,	····		
Company: AMERICAN STEE				
1				
Title: <u>ENVIRORMENTAL</u> Telephone Number: (21L) 823	AWALAM	_		

94865452

DATE SAMPLED

12/02/94

TIME

94 865452

12/02/94 REPORTED

10:30

AMERICAN STEEL FOUNDRIES

00000

12/09/94

	RESULT	हास स	REFERENCE LIMIT	
100 miles				UNITS
TCLP EXTRACTION PROC	FINAL PH=5.50			
TCLP METALS & BIAS %	To the state of th			
ARSENIC	(0.3	0.0	5.0	MG/L
Bpike recovery	110			7.
BARIUM	<0.5	0.0	100.0	MG/L
Spike recovery	101			7.
CADMIUM	₹0.05	0.0	1.0	MG/L
Spike recovery	107		~ ~ **	7.
CHROMIUM	<0.05	0.0	5.0	MG/L
Spike recovery	93			7.272
# SELENIUM	₹0.25	0.0	1.0	MG/L
Spike recovery	92			7.
# MERCURY	<0.002	0.0	0.2	MG/L
Spike recovery	108		** • • • • • • • • • • • • • • • • • •	%
LEAD E	<0.2	5.0	ีนั้ง (เ	NG/L
Spike recovery	100			7.
SILVER	2.0>	0.0	5.0	MG/L
Spike recovery	71			7.
TCLP SUPPL.METALS		*		1.
NICKEL E	0.4	r	· .	MG/L
Spike recovery	75			%
COPPER	<0.05			MC/L
Spike recovery	70			7
TCLP REVIEW				•
	्रा ११ ११			
	¥ 28 ■			
	TCLP PREPARATION	FOLLOWS METH	OD 1311 S	J-846
	AS REVISED NOVEMB	ER 24,1772 (57FR551141	:
	REVIEWED BY ALBER	T F. VICINIE	III, LAB S	SUPERVISOR
		-/		
		1805		
		11000		
H E	21			

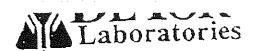
--- DIRECTORS ---

Patrick K. Jaynes Ph.D. Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 365-3396

BFI WASTE SYSTEMS WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 ATWATER 44201 CH



7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

E ANALYSIS REQUES' BROWNING-FERRIS IND		•
 1 1 the recent	Client#	W3

Location:	Left flowice	100K		Client#	U V	<u></u>	
Billing Co	ntrol #(Lab use	only) _	2755	130		<u> </u>	
Purchase	· Order#	<u> </u>	98385				
Generato	or/Project#	Amore	rea STea	•			
LAB ID#	8654	152	WCD #	AB3	1185		
	escription: of containers		S <i>ules ang</i> Multiph		Or.	ganic/oil	
Matrix	Soîl	Solid	Muttipe	456		Sarudi an	
	SES REQUESTE		•	RUSH	Υ.	N	
553 X 546 X	Metals + :	iction space Extracti spike recoveri ital metals +	es	oer & Nick	cel)	Bolox	300-01
544 <u>X</u>	Supplemen	ry Panel (Meta	spikes(cop	Rush Ser	vice)		
585 <u>/</u> 578	Volatiles +	- spike recove	eries				
582	Semi-volat	iles + spike re	ecoveries				
581		/Herbicides + s	spike recove	ries			
1002	Reactivity						
1003	Corrosivity						
859	Ignitability	, ,,		15			
511	النتانبسبيوري	oleum Hydroc	aroonsurr	1,1		***	
569	BETX						
502	PCB(soil)						••
	Other			***************************************		· · · · · · · · · · · · · · · · · · ·	
245 X	Signatory	Review					
		Date	Time	Compa	ny .		
Samole Taken By:	<u> </u>	0010		1		ا ،	
T, C3-le		2/2/84	10:30	4 / M	BRICA	DIRAL !	anderes
Sample Submitted	B4:/	7'				 	
Jampie Odd							
Sample Couriered	By:						
Al Caren	R.	12/2/54	4:20 n	3	F.S.	- Andrews	
Sample Received	8y:						
Spri Verb	Ka	12-2-91	4 4:33	DeYo	r Labora	tories	
	1						



WASTE APPROVAL FORM

Date

: 12/22/94

BFI Location

: Willowcreek Landfill

BFI Initiator

: Casanta, Al

Generator

: American Steel Foundries

Generator Location: Alliance, OH

WCD Number

: AB51184

BFI Number

: 202142

WASTE DESCRIPTION:

Sand, Foundry

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility... Glenwillow Landfill

Northern Ohio Landfill Willowcreek Landfill Ottawa Landfill

Mahoning Landfill

COMMENTS:

This waste has the potential to cause dusting problems.

The following items were received by the Corporate Waste Approval Group:

- a. Analytical data from DeYor MetPath Laboratories
- b. Chain of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217;218;219;220;855/960212/202142

Corporate Waste Approval Group

Diana L. Lasco

Technical Representative



OH DND18,019, 9400012 000142 BFI WASTE CODE DDO 855

WASTE APPE	HOVAL REQUEST
BFI to complete this area.	
BFI Initiator: A/ Capanta	Action Requested: □New Waste Approval
Location: Willowcreek / Hussillon	∯top-Date Approval - Previous Number: 20219 Z
Company Number: スパケ % パ	Disposal Site Requested: 217,218,218,220,855
Telephone: (2/6)	Company Number:
Fax: (2/6) 547-7724	Management Method Requested: Attandfill Attauling
Date:	Other
- 1	
	CTERIZATION DATA AL WASTE
IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTA INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS LEGIBLY PRINTED IN INK, AND SIGNED.	
1. GENERAT	TOR INFORMATION
a) Generator's Name: AMERICAN STEEL FOUNDLIES	e) State/Provincial/Local Registration No.: 14 A
b) Generating Facility's Address: 100) E. Bronoway ST.	Generator's EPA Id. No.: OHD981090418
City: ALLIANCE State: OH Zip: 44L0	Industry Description/SIC Code: 3325
c) Generator's Representative: TERRY C. Baroway	madally becomplicated code.
Title: Environmental Manage	f) Customer's Name:
Telephone: (216) 823 - 6150 Ext 206	g) Customer's Mailing Address:
	City:State:Zip:
Fax: (7.14) 821-4568 d) Emergency/information Contact: Same As Prove	h) Representative:
	Telephone: ()
Title:	
Telephone: ()	Fax: ()
2. GENERAL WAS	TE STREAM INFORMATION
Other Per: Year Month Week Day To be transported in: KBulk Drums (type/size)	to treatment. Regulations? □ Yes X No d: on Control Waste" as defined by State, Provincial, or local Regulations? Trocedures: □ □ Cubic Yards X Tons □ Gallons □ Cubic Meters □ Tonnes(metric) □ One Time □ Other
h) Is a representative sample included? A Yes ☐ No	
3. WASTE	PROPERTIES AT 72°F
a) Physical State:	e) Density Range: ND to
Solid □ Semi-solid	□ N/D □ lbs/gal. □ g./cc.
	□lbs./yd.³ □Kg/m³ □Other
□ Powder □ Liquid	albarya. angin apine
☐ Combination	A) Flooring Potent OF
b) Layers:	f) Flash Point, °F:
Single-layered □ Bi-layered □ Multi-layered	□≤72 □73-100 □101-140
c) Colors(s):	□141-200 □≥201 XIN/A XIN/D
Describe Tru Brown & BLACK	_
d) Odor:	g) pH:
Pescribe	□ ≤ 2 □ 2.1 - 5.0 □ 5.1 - 9.0
None ☐ Mild ☐ Strong	☐ 9.1 - 12.4 ☐ ≥ 12.5 🗖 N/A 🗆 N/D
_ - • •	- \

BFI WASTE CODE

4. REACTIVITY	5. THIS WASTE CONTAINS	6. SPECIAL WASTE COMPOSITION
if the waste exhibits any of rollowing reactive properties: Water Reactive Acid Reactive Alkaline Reactive Oxidizer Autopolymerizable Pyrophoric Explosive Thermally Sensitive Shock Sensitive	Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6. Free Liquids	Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary. Range Components Min. / Max. SILICA QH L CLAY C
	7. TRANSPORTATION INFORMATION	ON THE PROPERTY OF THE PROPERT
If the waste is a DOT Hazardous Proper USDOT Shipping Name: USDOT Hazard Class:	UN or NA Number:	CERCLA Reportable Quantity:
		N September School Control of the State St
None		☐ Memo/Letter ☐ Waste Composition No. of Pages:
	9 GENERATOR'S CERTIFICATIO	る状態をはいいかはいいませんのである。
I hereby certify that the above ar deliberate or willful omissions of not a regulated hazardous waste contain PCBs regulated by TSC/	nd attached description is complete and accurate to the composition or properties exist, that all known or suspect by the USEPA, by an applicable State or Provincial authority. A (i.e., 40 CFR 761) or any Provincial authority. SIGNATORY as identified in Section 1 (c):	best of my knowledge and ability to determine, that no sted hazards have been disclosed, and that the waste is
12-2-94 T.C.BE		Enviconnantal MANACES
DATE	PRINT NAME\ SIGNATURE-	TITLE
	REPRESENTATIVE SAMPLE CERTIFIC	CATION CONTROL OF THE PROPERTY
This Section is to be completed	by the person obtaining the sample of the above describ	ed waste.
I certify that the sample for which and preserved in a manner cons	h analytical data was provided on the waste described al sistent with accepted technical standards.	pove is representative of that waste and was collected
Lab sample assigned to: Collector's Name: T.C. & Signature: T.C. & Signature: T.C. & Signature: Title: Lune Market Signature: Title: Lune Market Signature: Title: Lune Market Signature: (216) & Signatur	MANAGER 23-6150 Ext. 206	pel)

WCD#AB51184; SPENT FOUNDRY SAND

94865451

94 865451

DATE SAMPLED

12/02/94

10:30

TIME

RECEIVED

12/02/94 REPORTED

AL RICAN STEEEL FOUNDRIES

5451

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12/19/94

				12/17/74
	RESULT	REFE	RENCE LIMIT	UNITS
TCLP EXTRACTION PROC	FINAL PH=5.40			:
ZERO HEADSPACE EXTRT	COMPLETED 12/07/	794		
TCLP METALS & BIAS %				
ARSENIC	<0. 5	<u>,</u> 0. 0	5. 0	MG/L
Spike recovery	116	•		7.
BARIUM	0. 5	0.0	100.0	MG/L
Spike recovery	99			7.
CADMIUM	<0.05	0. 0	1.0	MG/L
Spike recovery	108			7.
CHROMIUM	0.08	O. Q	5. O	MG/L
Spike recovery	72			7.
SELENIUM	<0. 25	Ο. Ο	1.0	MG/L
Spike recovery	94			7_
MERCURY	<0.002	0. 0	0.2	MG/L
Spike recovery	108			7.
LEAD	<0.2	0.0	5.0	MG/L
Spike recovery	104			%
SILVER	<0. 2	O. O	5. O	MG/L
Spike recovery	94			7.
TCLP SUPPL. METALS				
NICKEL	0. 3			MG/L
Spike recovery	9 5			%
COPPER	<0.05			MG/L
Spike recovery	87			%
TCLP VOA'S & BIAS %				
METHOD NUMBER	8240			
VINYL CHLORIDE	<0.002	0. 0	0. 2	MG/L
Spike recovery	103			%.
1,1-DICHLOROETHYLENE	<0.002	0. 0	0.7	MG/L
Spike recovery	92			%
METHYL ETHYL KETONE	<1.0	0. 0	200	MG/L
Spike recovery	99			7.
CHLOROFORM	<0.002	0. 0	6. 0	MG/L
Spike recovery	101			7.
CARBON TETRACHLORIDE	<0.002	O. O	0. 5	MG/L
Spike recovery	104			%
BENZENE	<0.002	0. 0	0. 5	MG/L
Spike recovery	83			7.

--- DIRECTORS ---

Patrick K. Jaynes Ph. D. Anthony Nasrallah Ph. D.



7655 Market Street, Suite 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 365-3396 BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201

Reference limit is provided for convenience. It may not apply to every hazard assessment. Be certain correct limit is applied to evaluation.

THE PROPERTY OF THE PROPERTY O

WCD#AB51184; SPENT FOUNDRY SAND

94865451

LAB ID NO.

94 865451

DATE SAMPLED

TIME

10:30

RECEIVED 12/02/94

2/02

AL_AICAN STEEEL FOUNDRIES

5451

12/02/94

00000

REPORTED 12/19/94

	RESULT	REFER	ENCE LIMIT	UNITS
1,2-DICHLOROETHANE	<0. 002	0. 0	0. 5	MG/L
Spike recovery	100	O. O	Q. Q	11G/L %
TRICHLOROETHYLENE	<0.002	0. 0	0. 5	MG/L
Spike recovery	97	2.7.2		%
TETRACHLOROETHYLENE	<0.002	0. 0	0.7	MG/L
Spike recovery	92			7.
CHLOROBENZENE	<0.002	0. 0	100.0	MG/L
Spike recovery	100			%
1,4-DICHLOROBENZENE	<0.002	Q. O	7. 5	MG/L
Spike recovery	99			%
TCLP BNA'S & BIAS % METHOD NUMBER	8770			
CRESOLS	8270 <0.10	0. 0	200	b475 / L
Spike recovery	79	0. 0	200	MG/L %
2,4-DINITROTOLUENE	<0.10	0. 0	0.13	MG/L
Spike recovery	109	0. 0	0. 13	7G/L
HEXACHLOROBENZENE	<0.10	O. Q	0.13	MG/L
Spike recovery	126	5. 5		7.67 2.
HEXACHLOROBUTADIENE	<0.10	0. 0	0. 50	MG/L
Spike recovery	96	*		%
HEXACHLOROETHANE	<0. 10	0. 0	3. 0	MG/L
Spike recovery	82			7.
NITROBENZENE	<0.10	0. 0	2.0	MG/L
Spike recovery	122		•	%
PENTACHLOROPHENOL	<0. 10	O. Q	100.	MG/L
Spike recovery	96			%
PYRIDINE	<0.10	O. O	5. 0	MG/L
Spike recovery 2,4,5-TRICHLOROPHEN	80 <0.10	~ ~	800	% #^ //
Spike recovery	121	O. Q	400.	MG/L
2,4,6-TRICHLOROPHEN	<0.10	0. 0	2. 0	% MG/L
Spike recovery	86	V. U	c. V	76/L
REACTIVITY SCREEN	SAMPLE DISPLAYE	REACTIVE SUI	FIDE AT 4	
	REACTIVE CYANIDE			is de 1110
	ASTM D5049 METHO		HOD B	•
CORROSIVITY SCREEN	SAMPLE IS NONCOR	RROSIVE, PH =	10. 31	
	ASTM D4980 METH			

--- DIRECTORS ---Patrick K. Jaynes Ph.D.

Anthony Nasrallah Ph. D.



7655 Market Street, Suite 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 365-3396 BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201

の交流。GLIENT SAMPLE IDENTIFICATION

WCD#AB51184; SPENT FOUNDRY SAND

94865451

LAB ID NO

94 865451

12/02/94 REPORTED

RECEIVED

DATE SAMPLED

12/02/94

10:30

TIME

12/19/94

ALLRICAN STEEEL FOUNDRIES

5451

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IGNITABILITY TEST

TCLP REVIEW

RESULT

SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION. ASTM D4982 METHOD B/ASTM D93

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24,1992 (57FR55114) REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

DIRECTORS ---Patrick K. Jaynes Ph.D. Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 365-3396

BFI WASTE SYSTEMS WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 ATWATER OH 44201



7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

BROWNING-FERRIS INDUSTRIES

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY

	(A1-1300	-		•	87	7 G
Location:	_Willowcreek			Client#	-623	
Billing Con	trol #(Lab use	only)	94-275	531		_
Purchase (Order#		155-1			_
Generator/	Project#	Rey	1,000.	5	Tspesac 10293	(C0.
LAB ID#	_ 8651	55	WCD#	AB 4	6293	_
Waste Des		li c	TP 5	(-268		
Number of Matrix	containers	<u></u>	Multipha	se	Organic	/oil
553 X 546 X 548 X 544 X 585 578 X 582 X 581 X 1002 1003 859 511 569	Metals + s Supplement UST Priority Volatiles + Semi-volatil Pesticides/F Reactivity S Corrosivity Ignitability	etion pace Extracti pike recoverie al metals + Panel (Metal spike recove es + spike re derbicides + s Gereen	on spikes(Coppe sls + TPH+F ries coveries pike recoveri	Rush Servi		
502	PCB(soil) Other					
245 X	Signatory R	leview				
Sample Taken By: ,	<u> </u>	Date	Time	Company		****
MAMA ASSample Submitted By:	Theo	11-30-94	1015A	Ren	nolds Di	5 po 51 Co
1	jwo	11/30	18.20	BFI	- CA12	300
Sample Couriered By:	<u> </u>		<u> </u>			
Same _						
Sample Received By:				1		
Dening Bre	edy	11-30-94	18:20	DeYor L	.aboratories	
	1/					



7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY BROWNING-FERRIS INDUSTRIES

Location	: /2/1/10/11/	reek		Client#	_6	,23	
Billing C	ontrol #(Lab use	only)	27	5550			
Purchas	e Order#		7/9838	5			
Generat	or/Preiect#	American	Steel 1	Found 1	(7es	· · · · · · · · · · · · · · · · · · ·	
LAB ID#	86545	i1	WCD#	AB 3	51184		
	Description: of containersSoil	Spant)	•			rganic/oi	
ANALY 553 <u>↓</u> 546 <u> </u> 548 <u> </u>	Metals + sp	tion pace Extraction pike recoverie	es	RUSH	Υ.	N	
544X 585 578X 582X	UST Priority Volatiles + Semi-volatile	al metals + : Panel (Meta spike recove es + spike re- erbicides + s	ls + TPH+l ries coveries	Rush Sen		Hericor	4/606- 0}
1002 0 1003 7 859 7	Reactivity S Corrosivity S Ignitability	creen					
569 502	BETX PCB(soil)						
245 X	Other Signatory R	eview					
Sample Taken By:		Date	Time	Compan	Y		
T.C. B. Sample Submitted I	l	12/2/84	10:30Am	AME	eican L	STEEL	Famperes
Cample Odomices							
Sample Couriered B	y:	·	T	· · · · · · · · · · · · · · · · · · ·			
Al Casanta		12/2/94	4:20m	BI	I		
Sample Received Br	ía.	12-2.94	4:30pm	DeYor	Laborat	ories	
/	11/	10011	1 1 - 1 - 1 10	12	3 3	_ 	



WASTE APPROVAL FORM

Date

: 12/22/94

BFI Location

: Willowcreek Landfill

BFI Initiator

: Casanta, Al

Generator

: American Steel Foundries

Generator Location : Alliance, OH

WCD Number

: AB51183

BFI Number

: 202145

WASTE DESCRIPTION:

Sand, Foundry Sand, Core Butts

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility...

Glenwillow Landfill Northern Ohio Landfill Willowcreek Landfill Ottawa Landfill Mahoning Landfill

COMMENTS:

WCD updated December 2, 1994.

This waste has the potential to cause dusting problems.

The following items were received by the Corporate Waste Approval Group:

- a. Analytical data from DeYor MetPath Laboratories
- b. Chain of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217;218;219;220;855/960212/202145

Corporate Waste Approval Group

Diana L. Lasco

Technical Representative



_0HDN,DK	0191	9600112	1200/95
BFI WASTE CODE			

WASTE APPR	OVAL REQUEST
3FI to complete this area.	
BFI Initiator: A/ Casa a Ta	Action Requested: □New Waste Approvat
Location: Willowiciaek/ Massillon	#Up-Date Approval - Previous Number: 202/45
Company Number: 2/8 / 6//	Disposal Site Requested: 3/7, 3/8, 7/8, 720, 850
Telephone: (2/6) <u>547-7.548</u>	Company Number:
Fax: (2/6) 947-2724	Management Method Requested: 图Landfill 图Hauling
Date: Dec 2, 1884	☐ Other
	CTERIZATION DATA AL WASTE
IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTAT INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS T LEGIBLY PRINTED IN INK, AND SIGNED.	
1. GENERATO	OR INFORMATION
a) Generator's Name: AMERICAL STEEL FOUNDRIES	e) State/Provincial/Local Registration No.: N/A
b) Generating Facility's Address: 1001 E. BRORDWRY ST.	Generator's EPA Id. No.: <u>DHD 981 090418</u>
City: ALLIANCE State: OH Zip: 44601	Industry Description/SIC Code: 3325
c) Generator's Representative: TERRY C. BRADURY	
Title: Environmental Manneber	f) Customer's Name:
Telephone: (216) 823-6150 ExT 206	g) Customer's Mailing Address:
Fax: (216) 821-4548	City:State:Zip:
d) Emergency/Information Contact: Same as Above	h) Representative:
Title:	Telephone: ()
Immonance:	Fav. / \
Telephone: ()	Fax: ()
a) Name/Description of The Waste: Broken Cook Bot	TE STREAM INFORMATION TTS (EXEMPT WASTE)
a) Name/Description of The Waste: BROKEN CORE BOT b) Process Generating Waste: C) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Re If yes, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes \(\subseteq No \) If yes, enter Waste Identification Number: N Secommended personal protection equipment and special handling process.	ESTREAM INFORMATION The Control Waster as defined by State, Provincial, or local Regulations?
2. GENERAL WAST a) Name/Description of The Waste: BROKEN CORE SOT b) Process Generating Waste: CORE MRDOKENCIANISC c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Re If yes, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution KYES No If yes, enter Waste Identification Number: NA f) Recommended personal protection equipment and special handling pro	TE STREAM INFORMATION TO (EXEMPT WASTE) C FOR STEEL FOUNDRY I hazardous waste? Yes & No to treatment. egulations? Yes & No C Control Waste" as defined by State, Provincial, or local Regulations? Coedures: None
2. GENERAL WAST a) Name/Description of The Waste: BROKEN CORE ST b) Process Generating Waste: CORE MRDUFINGTURING c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to its this a "Hazardous Waste" as defined by State, Provincial, or local Refigues, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes In No If yes, enter Waste Identification Number: No If Recommended personal protection equipment and special handling process In Anticipated Volume: Per: In Year In Month Seweek In Day In Cother In Industrial Process In Anticipated In Industrial Process In Anticipated Volume: In Industrial Process In Anticipated In Industrial Process In Industrial Industrial Industrial Industrial Industrial Industrial Indu	TE STREAM INFORMATION TE STREAM INFORMATION TE STREAM INFORMATION TE STREAM INFORMATION THE STREAM INFORMATION TO STREAM INFORMATION
a) Name/Description of The Waste: BROYER CORE BY b) Process Generating Waste: CORE MANYER CORE BY c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Re If yes, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes \sum No If yes, enter Waste Identification Number: No f) Recommended personal protection equipment and special handling pro g) Anticipated Volume: Per: Year Month Week Day Co	TE STREAM INFORMATION TE STREAM INFORMATION TE STREAM INFORMATION TE STREAM INFORMATION THE STREAM INFORMATION TO STREAM INFORMATION
2. GENERAL WAST a) Name/Description of The Waste: BROKEN CORE ST b) Process Generating Waste: CORE MRDUFINGTURING c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to its this a "Hazardous Waste" as defined by State, Provincial, or local Refigues, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes In No If yes, enter Waste Identification Number: No If Recommended personal protection equipment and special handling process In Anticipated Volume: Per: In Year In Month Seweek In Day In Cother In Industrial Process In Anticipated In Industrial Process In Anticipated Volume: In Industrial Process In Anticipated In Industrial Process In Industrial Industrial Industrial Industrial Industrial Industrial Indu	TE STREAM INFORMATION TE STREAM INFORMATION TE STREAM INFORMATION TE STREAM INFORMATION THE STREAM INFORMATION TO STREAM INFORMATION
a) Name/Description of The Waste: Beaver Core 357 b) Process Generating Waste: Core 1057 c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Ref yes, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution 12 Yes No If yes, enter Waste Identification Number: No Recommended personal protection equipment and special handling process of transported in: 12 Tous No No Note Note No	TE STREAM INFORMATION TE STREAM INFORMATION TE STREAM INFORMATION TE STREAM INFORMATION THE STREAM INFORMATION TO STREAM INFORMATION
a) Name/Description of The Waste: Beaver Core Solon Process Generating Waste: Core Manufacture of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to its this a "Hazardous Waste" as defined by State, Provincial, or local Reflyes, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes \(\text{No} \) If yes, enter Waste Identification Number: \(\text{No} \) Recommended personal protection equipment and special handling process. g) Anticipated Volume: \(\text{Per:} \) Year \(\text{Month Month Sweek} \(\text{Day} \) Other \(\text{Per:} \) Year \(\text{Month Month Sweek} \(\text{Day} \) Other \(\text{To be transported in:} \) Buik \(\text{Drums (type/size)} \(\text{No} \)	TE STREAM INFORMATION TE STREAM INFORMATION TE STREAM INFORMATION TO STREAM
2. GENERAL WAST a) Name/Description of The Waste: Beaven Core Solution b) Process Generating Waste: Core Manufacture of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Re If yes, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Reyes \(\text{No} \) If yes, enter Waste Identification Number: \(\text{No} \) f) Recommended personal protection equipment and special handling pro g) Anticipated Volume: \(\text{Points} \) Other \(\text{Per:} \) Year \(\text{Month Month Seweek} \(\text{Day} \) To be transported in: \(\text{Month Bulk} \) Drums (type/size) \(\text{his a representative sample included? Reyes \(\text{No} \) 3. WASTE P	TE STREAM INFORMATION TE (EXEMPT WASTE) A hazardous waste?
2. GENERAL WAST a) Name/Description of The Waste: BROKEN CORE SITE b) Process Generating Waste: CORE MRADIFICATURING c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Re If yes, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Refer No If yes, enter Waste Identification Number: Ne f) Recommended personal protection equipment and special handling process g) Anticipated Volume: Per: Year Month Seweek Day Control of the Tobe transported in: Bulk Drums (type/size) h) Is a representative sample included? Yes No 3. WASTEP	TE STREAM INFORMATION TE (EXEMPT WASTE) A hazardous waste?
2. GENERAL WAST a) Name/Description of The Waste: Beaver Core Solution b) Process Generating Waste: Core Major Franciscolor Color Solution c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to the strike of the Waste Identification by State, Provincial, or local Reflex of the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Extended Process Waste", an "Industrial Process Waste", or a "Pollution In the Secondary Color C	TE STREAM INFORMATION TE (EXEMPT WASTE) A hazardous waste?
2. GENERAL WAST a) Name/Description of The Waste: BROXEN CORE ST b) Process Generating Waste: CORE MODUFACTURING c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to 1s this a "Hazardous Waste" as defined by State, Provincial, or local Reflex, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes In Now If yes, enter Waste Identification Number: Now In Recommended personal protection equipment and special handling process. g) Anticipated Volume: The Year In Month Week In Day In To be transported in: Buik Included? Yes In Now Its a representative sample included? Yes In Now Its a representative sample included? Yes In Now Its and Included? Yes In Now Its ana	TE STREAM INFORMATION TE (EXEMPT WASTE) A hazardous waste?
2. GENERAL WAST a) Name/Description of The Waste: Broken Core Both b) Process Generating Waste: Core Manufacture of the Waste of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to d) is this a "Hazardous Waste" as defined by State, Provincial, or local Re If yes, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Reves No If yes, enter Waste Identification Number: No f) Recommended personal protection equipment and special handling pro g) Anticipated Volume: Per: Year Month Revek Day Other Per: Year Month Revek Day Other Per: Year No so transported in: Bulk Drums (type/size) h) Is a representative sample included? Yes No 3. WASTEP a) Physical State: Solid Semi-solid Powder Liquid Combination	TE STREAM INFORMATION TE (EXEMPT WASTE) A FOR STEEL FOUNDRY I hazardous waste?
a) Name/Description of The Waste: BROYER CORE ST b) Process Generating Waste: CORE MRANKECTURING c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Re If yes, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Exyes \(\text{No} \) If yes, enter Waste Identification Number: \(\text{No} \) i) Recommended personal protection equipment and special handling pro g) Anticipated Volume: \(\text{Per:} \) Year \(\text{Month Sweek} \) Day \(\text{Dot} \) To be transported in: \(\text{Molling Bulk} \) Drums (type/size) \(\text{his a representative sample included? } \(\text{Myes} \) No 3. WASTE P a) Physical State: \(\text{Solid} \) Semi-solid \(\text{Powder} \) Combination b) Layers: \(\text{Single-layered} \) \(\text{Bi-layered} \) \(\text{Multi-layered} \) c) Colors(s):	TE STREAM INFORMATION TE (EXEMPT WASTE) A FOR STEEL FOUNDRY I hazardous waste?
2. GENERAL WAST a) Name/Description of The Waste: BROYER CORE ST b) Process Generating Waste: CORE MOUNT CETURIUM c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to the lify yes, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution In the lify yes, enter Waste Identification Number: In the lify	Care
2. GENERAL WAST a) Name/Description of The Waste: BROYER CORE ST b) Process Generating Waste: CORE MRANGE CORE ST c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to the state of the waste and the process generating the waste prior to the state of the waste and the process generating the waste prior to the state of the waste and the process generating the waste prior to the state of the waste and the process generating the waste prior to the state of the waste and the process generating the waste prior to local Reference in the waste in the waste prior to the state of the waste in the waste in the waste prior to the state of the waste in the waste ine	Care
a) Name/Description of The Waste: Broken Core Bot Describe Describe in the Waste: Broken Core Bot Describe in the Waste in Radiation of the Waste in Radiation in the Waste prior to the Waste in the Wa	E STREAM INFORMATION TEXTREM VASTR A FOR STEEL FOUNDRY I hazardous waste? □ Yes ☒ No o treatment. egulations? □ Yes ☒ No I Control Waste" as defined by State, Provincial, or local Regulations? Cocedures: NonE □ □ Cubic Yards ☒ Tons □ Gallons □ Cubic Meters □ Tonnes(metric) One Time □ Other □ Other PROPERTIES AT 72°F e) Density Range: Nto □ to □ N/D □ lbs/gal. □ g./cc. □ lbs./yd.³ □ Kg/m³ □ Other f) Flash Point, °F: □ ⊆ 72 □ 173-100 □ 101-140 □ 141-200 □ ≥ 201 ☒ N/A ☒ N/D

BFI WASTE CODE

4. REACTIVITY	5. THIS	WASTE CONTAINS		6. SPECIAL WASTE COM	MPOSITION
⇒ if the waste exhibits any of following reactive properties: □ Water Reactive □ Acid Reactive □ Alkaline Reactive □ Oxidizer □ Autopolymerizable □ Pyrophoric □ Explosive □ Thermally Sensitive □ Shock Sensitive ▼ None of the above	If any are check (if applicable) ar	☐ Pathogens a ☐ Biological Materials ☐ Radioactive Materials		Concentration ranges are sugg must be identified in percentag parts per million (ppm). Attach necessary. Components Samo	es (%) and/or
-		**			
	7.]	TRANSPORTATION INFORMAT	ION.		
If the waste is a DOT Hazardous Proper USDOT Shipping Name: USDOT Hazard Class:	NONE		3 3	CERCLA Reportable Quantity:	
		SUPPLEMENTAL INFORMATI	ON		
the Bartograph studge is the control of the Section for the section is				· · · · · · · · · · · · · · · · · · ·	
☐ None ☐ MSD Sheets ☐ Other - describe:	☐ Analytical Da	ta	, ⁻ 0	Memo/Letter	nposition Pages:
☐ Other - describe:			,		•
☐ Other - describe:	d attached description composition or propert by the USEPA, by an (i.e., 40 CFR 761) or	is complete and accurate to the fies exist, that all known or suspenapplicable State or Provincial autony Provincial autony Provincial authority.	ON =	of my knowledge and ability to de hazards have been disclosed, and	Pages:etermine, that no d that the waste is
I hereby certify that the above an deliberate or willful omissions of not a regulated hazardous waste contain PCBs regulated by TSC/GENERATOR'S AUTHORIZED	d attached description composition or propert by the USEPA, by an (i.e., 40 CFR 761) or SIGNATORY as identification.	is complete and accurate to the ies exist, that all known or suspense applicable State or Provincial authority. The ied in Section 1 (c):	ON =	of my knowledge and ability to de hazards have been disclosed, and y, or by any applicable local author	etermine, that no d that the waste is prity, and does not
I hereby certify that the above and deliberate or willful omissions of not a regulated hazardous waste contain PCBs regulated by TSC/GENERATOR'S AUTHORIZED TO COME TO	d attached description composition or propert by the USEPA, by an (i.e., 40 CFR 761) or SIGNATORY as identification.	is complete and accurate to the ies exist, that all known or suspe applicable State or Provincial au any Provincial authority. ied in Section 1 (c):	on se best ected luthority	of my knowledge and ability to de hazards have been disclosed, and y, or by any applicable local author	etermine, that no d that the waste is prity, and does not
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I hereby certify that the above and deliberate or willful omissions of not a regulated hazardous waste contain PCBs regulated by TSCAGENERATOR'S AUTHORIZED TO DATE This Section is to be completed I certify that the sample for which and preserved in a manner consideration.	d attached description composition or propert by the USEPA, by an (i.e., 40 CFR 761) or SIGNATORY as identified by the PRINT NAME REPRESON TO THE PRINT NAME REPRESON TO THE PRINT NAME REPRESON TO THE PRINT NA	is complete and accurate to the ies exist, that all known or suspe applicable State or Provincial au any Provincial authority. The ied in Section 1 (c): SIGNATURE SIGNATURE The sample of the above described according to the waste described according to the standards.	on e best ected luthority	of my knowledge and ability to de hazards have been disclosed, and y, or by any applicable local authority. TITLE ON	etermine, that no d that the waste is prity, and does not
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I hereby certify that the above and deliberate or willful omissions of not a regulated hazardous waste contain PCBs regulated by TSC/GENERATOR'S AUTHORIZED DATE This Section is to be completed I certify that the sample for which and preserved in a manner consultab sample assigned to: Collector's Name: T.C.S.Signature:	d attached description composition or propert by the USEPA, by an (i.e., 40 CFR 761) or SIGNATORY as identified by the person obtaining an analytical data was pristent with accepted te	is complete and accurate to the ies exist, that all known or suspense applicable State or Provincial authority. The ied in Section 1 (c): SIGNATURE SIGNATURE SENTATIVE SAMPLE CERTIFY the sample of the above described in covided on the waste described in chnical standards. (peel off I	on e best ected luthority	of my knowledge and ability to de hazards have been disclosed, and y, or by any applicable local authority. TITLE ON	etermine, that no d that the waste is prity, and does not
I hereby certify that the above and deliberate or willful omissions of not a regulated hazardous waste contain PCBs regulated by TSC/GENERATOR'S AUTHORIZED DATE This Section is to be completed I certify that the sample for which and preserved in a manner consultab sample assigned to: Collector's Name: T.C.S. Signature: Company: Com	d attached description composition or propert by the USEPA, by an (i.e., 40 CFR 761) or SIGNATORY as identification. PRINT NAME REPREDICT TO THE PRINT NAME TO THE PRINT NAM	is complete and accurate to the ies exist, that all known or suspense applicable State or Provincial authority. The ied in Section 1 (c): SIGNATURE SIGNATURE SENTATIVE SAMPLE CERTIFY of the sample of the above description of the waste described acchnical standards. (peel off 1)	on e best ected luthority	of my knowledge and ability to de hazards have been disclosed, and y, or by any applicable local authority. TITLE ON	etermine, that no d that the waste is prity, and does not
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CALL TO THE GREEK AND COMPLETE SECTION OF THE SECTI

WCD#AB51183; BROKEN CORE BUTTS

94865450

94 865450

DATE SAMPLED

TIME

RECEIVED

12/02/94

00:00

12/02/94 REPORTED

A _RICAN STEEL FOUNDRIES

5450

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12/19/94

ALLKICAN SIEEL FUUNDKIES	3430	VVVVV		15/17/74
			ia talogia e cas	
	RESULT	REF	ERENCE LIMIT	UNITS
CLP EXTRACTION PROC	FINAL PH=5.22			
ZERO HEADSPACE EXTRT	COMPLETED 12/07/94	4		
TCLP METALS & BIAS %				
ARSENIC	<0. 5	0. 0	5. 0	MG/L
Spike reco∨ery	118			<mark>ኤ</mark>
BARIUM	<0. 5	0. 0	100.0	MG/L
Spike recovery	9 9			%
CADMIUM	<0.05	0. 0	1. 0	MG/L
Spike recovery	110			7.
CHROMIUM	O. 1	O. O	5. O	MG/L
Spike recovery	92			7.
SELENIUM	<0.25	0. 0	1.0	MG/L
Spike recovery	99			%
MERCURY	<0.002	0. 0	0. 2	MG/L
Spike recovery	104			7.
LEAD	<0. 2	0. 0	5. O	MG/L
Spike recovery	104			%
SILVER	co. 2	0.0	5. 0	MG/L
Spike recovery	94			7.
CLP SUPPL METALS				
NICKEL	<0. 2			MG/L
Spike recovery	100			7.
COPPER	<0.05			MG/L
Spike recovery	95			%
CLP VOA'S & BIAS %				
METHOD NUMBER	8240			
VINYL CHLORIDE	<0.002	0.0	0. 2	MG/L
Spike recovery	79			7.
1,1-DICHLORGETHYLENE	<0.002	0. 0	0. 7	MG/L
Spike recovery	92			%
METHYL ETHYL KETONE	<1.0	O, Q.	200	MG/L
Spike recovery	104	•		7.
CHLOROFORM	<0.002	0. 0	6. 0	MG/L
Spike recovery	102	•		7.
CARBON TETRACHLORIDE	<0.002	0. 0	0. 5	MG/L
Spike recovery	96			Z.
BENZENE	<0.002	0. 0	0. 5	MG/L
Spike recovery	88			74
•				

--- DIRECTORS ---Patrick K. Jaynes Ph.D. Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 365-3396 BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201

Reference limit is provided for convenience. It may not apply to every hazard assessment. Be certain correct limit is applied to evaluation.

WCD#AB51183; BROKEN CORE BUTTS

94865450

94 865450

DATE SAMPLED

TIME

RECEIVED

12/02/94

00:00

12/02/94 REPORTED

AnLRICAN STEEL FOUNDRIES

5450

00000

12/19/94

	RESULT	REFERE	NCE LIMIT	UNITS			
			in the second				
1.2-DICHLOROETHANE	<0.002	0. 0	0. 5	MG/L			
Spike recovery	96			%			
TRICHLOROETHYLENE	<0. 002	O. O	0. 5	MG/L			
Spike recovery	89			%			
TETRACHLOROETHYLENE	<0.002	0. Q	0. 7	MG/L			
Spike recovery	95			7.			
CHLOROBENZENE	co. 002	0. 0	100.0	MG/L			
Spike recovery	91			%			
1,4-DICHLOROBENZENE	<0.002	0. Q	7. 5	MG/L			
Spike recovery	103			%			
TCLP BNA'S & BIAS %	0070						
METHOD NUMBER	8270 SAMPLE RE-PREPPED, SURROGATES OUT ON BOTH ANALYSES.						
CRESOLS	CO. 10			· · · · · · · · · · · · · · · · · · ·			
Spike recovery	25	0. 0	200	MG/L			
2,4-DINITROTOLUENE	<0.10	0. 0	0. 13	% MG/L			
Spike recovery	103	Q. U	0. 13	ne/L %			
HEXACHLOROBENZENE	<0.10	0. 0	0. 13	MG/L			
Spike recovery	110	0. 0	U. 13	%			
HEXACHLOROBUTADIENE	<0.10	0. 0	0. 50	MG/L			
Spike recovery	71	, U. U	0.00	%			
HEXACHLOROETHANE	<0.10	0. 0	3. 0	MG/L			
Spike recovery	74	0. 0	U. U ,	%			
NITROBENZENE	<0.10	0. 0	2. 0	MG/L			
Spike recovery	95		H. W	7			
PENTACHLOROPHENOL	<0.10	0. 0	100.	MG/L			
Spike recovery	97	<u>-</u>		%			
PYRIDINE	<0.10	0. Q	5. 0	MG/L			
Spike recovery	72			7.			
2,4,5-TRICHLOROPHEN	<0. 10	O. Q	400.	MG/L			
Spike recovery	54			7.			
2,4,6-TRICHLOROPHEN	<0.10	0. 0	2. 0	MG/L			
Spike recovery	50			7.			
REACTIVITY SCREEN	SAMPLE DISPLAYED	REACTIVE SULF	IDE AT 2pp	n			
	REACTIVE CYANIDE	C2. 0 PPM					
	ASTM D5049 METHO	25					
		•					
CORROSIVITY SCREEN	SAMPLE IS NONCOR	ROSIVE, PH = 9	7. 82				

--- DIRECTORS --Patrick K. Jaynes Ph.D.
Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 365-3396

BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201

森の学者 Griel/近台Will EIDE/MIE(GVIIO)/多数数数

WCD#AB51183; BROKEN CORE BUTTS

94865450

LAB ID NO.

94 865450 ALTERIAN CO.

DATE SAMPLED

12/02/94

00:00

RECEIVED 12/02/94

AMERICAN STEEL FOUNDRIES

5450

00000

REPORTED 12/19/94

TIME

IGNITABILITY TEST

TCLP REVIEW

ASTM D4980 METHOD B/USEPA 9040

SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION. ASTM D4982 METHOD B/ASTM D93

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24,1992 (57FR55114) REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

Mulln

DIRECTORS Patrick K. Jaynes Ph.D. Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 365-3396

BFI WASTE SYSTEMS WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 ATWATER 44201 OH



7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY BROWNING-FERRIS INDUSTRIES

t	Location:	Willowes	es K		Client#	623	_	
E	Billing Conti	rol #(Lab use	only)	27555	50		-	
8	Purchase O	rder#	21	98385	TRANSPORT OF THE STREET	···	-	
	Generator/P	roject#	America	n STed	founds	65	_	
	ĹAB ID#	865	450	WCD #	A13 51	183		
	Waste Desc Number of		Broken Co 2			us I found	by Sand)
1	Matrix	Soil	<u>K</u> Solid	Multipha	se	Organic	'oil	
553 546 548 544 585 578 582 581 1002 1003 859 511 569 502	ANALYSES X X X X X X X X X X X X X	Metals + sp Supplement. UST Priority Volatiles + Semi-volatile Pesticides/H Reactivity S Corrosivity S Ignitability Total Petrole BETX PCB(soil)	etion pace Extraction pace Extraction pace Extraction pace Extraction pace recovers pace (Metal spike recove es + spike re lerbicides + spike creen Screen eum Hydroca	es spikes(Coppo Is + TPH+F ries coveries pike recoveri	Rush Servic	e)	APH &	/ooa ← od
245	X	Signatory R	eview					
mple Take	en By:		Date	Time	Company	· · · · · · · · · · · · · · · · · · ·		1
T. C. B.	Zu Ju	1	12/2/94	10:30 pm	America	m STRKL	Found	PERS.
imple Subr	mitted By:	/		<u></u>			w	7
								,
imple Cou	riered By:	······································	T .	<u> </u>				_
	exoTa_		2/2/94	4:20M	BFI	· 		
imple Rece	eived By:			1				
Rich	ribha		2-2-94	4. 30m	DeYor La	boratories	•	
		: .		•				



7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY BROWNING-FERRIS INDUSTRIES

Location:	Willowa	ves K		Client#		**********	
Billing Con	trol #(Lab use	e only)					
Purchase (Order#	21	98385	-			
Generator/	Project#	America	n Steel	found	1105		
LAB ID#			WCD#	A13 5	1183		
Waste Des Number of Matrix	scription: containers Soil	Broken C 2 X Solid	oro buTTs Multipha			anic/oil	J)
ANALYSE 553	Metals + s Supplemen UST Priorit Volatiles + Semi-volati Pesticides/I Reactivity Corrosivity	space Extract spike recoveri tal metals + ty Panel (Metalis) spike recoveri iles + spike re Herbicides + s Screen Screen	es spikes(Copp als + TPH + eries ecoveries spike recover	Rush Servi	:1)	N Apr	₩ 1000 cod
Sample Taken By:		Date	Time	Company]
Sample Submitted By:	1	12/2/94	10:30 pm	Ameer	um 59.	TELL FOU.	-DERS
Sample Submitted by.	<i>U</i>						
Sample Couriered By:			1	<u> </u>			
Al Casanta		12/2/94	4:20pg	BFI			
Sample Received By:				1			
Shibha		2-2-94	4. 30pr	DeYor I	aborato	ries	
/\	-						



WASTE APPROVAL FORM

Date

: 02/16/95

BFI Location

: Willowcreek Landfill

BFI Initiator

Casanta, Al

Generator

: American Steel Foundries

Generator Location : Alliance, OH

WCD Number

: AB61409

BFI Number

: 203178

WASTE DESCRIPTION: Sludge, Dewatered

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility...

Glenwillow Landfill

Northern Ohio Landfill Willowcreek Landfill Ottawa Landfill Mahoning Landfill

COMMENTS:

WCD updated January 30, 1995.

All wastes containing free liquids must be solidified before disposal. Liquid waste is defined as any waste material determined to contain free liquids as defined by Method 9095 "Paint Filter Liquids Test".

The following items were received by the Corporate Waste Approval Group:

- a. Analytical data from DeYor MetPath Laboratories
- b. Chain of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217;218;219;220;855/960326/203178

Corporate Waste Approval Group

Diana L. Lasco

Technical Representative



011 017, 018, 019, 1 960306 1003178 BFI WASTE CODE 200, 855

WASTE APPRO	VAL REQUEST
BFI to complete this area.	
BFI Initiator: AI Casanta	Action Requested: 🗷 New Waste Approval
Location: Willow creek / Mossillow	□ Up-Date Approval - Previous Number: 203178
Company Number: 219 / 611	Disposal Site Requested: 217.218.219, 226, 855
Telephone: (216) 947-2548	Company Number: // / / // /
Fax: (216) 947-2724	Management Method Requested: ALandfill Alauling
Date: 1-30-95	☐ Other
WASTE CHARACT SPECIAL	TERIZATION DATA L WASTE
IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVINSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO LEGIBLY PRINTED IN INK, AND SIGNED.	
1. GENERATO	RINFORMATION
a) Generator's Name: Amgrican STEPL Foundries	e) State/Provincial/Local Registration No.:
b) Generating Facility's Address: 1001 E. Bearoway	Generator's EPA Id. No.: OHD 981090418
City: ALLIANCE State: OH Zip: 44601	Industry Description/SIC Code: 3325
c) Generator's Representative: T.C. Baroway	
Title: Environ mental Manaced	f) Customer's Name: Same
Telephone: (214) 823-6150 EXT 206	g) Customer's Mailing Address:
Fax: (216) 821 -4568	City: State: Zip:
d) Emergency/Information Contact: Same as Agous	h) Representative:
Title:	Telephone: ()
Telephone: ()	Fax: ()
2. GENERAL WASTE	STREAM INFORMATION
b) Process Generating Waste: Service Waste System of the State of a waste which was previously a restricted has the second of the second of the waste and the process generating the waste prior to d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulf yes, enter the Waste Identification Number if one has been assigned: e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Of the Second	nazardous waste?
f) Recommended personal protection equipment and special handling proc	redures: Nowe
	☐ Cubic Yards 🏲 Tons ☐ Gallons ☐ Cubic Meters ☐ Tonnes(metric)
9/7/1/10/04/04 70/4/10	ne Time Other
To be transported in:	
h) Is a representative sample included? Y Yes □ No	
	ROPERTIES AT 72°F
a) Physical State:	e) Density Range: to
Solid Semi-solid	□ N/D □ Ibs/gal. □ g./cc.
Powder Liquid	□lbs./yd. ³ □Kg/m ³ □Other
Combination	A Florid OF:
b) Layers:	f) Flash Point, °F:
∑Singte-layered ☐ Bi-layered ☐ Multi-layered	□≤72 □73-100 □101-140
c) Colors(s):	□141-200 □≥201 X (N/A □N/D
Describe BLARK	-1-16
d) Odor:	g) pH:
Describe	$\Box \le 2 \Box 2.1 - 5.0 \Box 5.1 - 9.0$
SNone □ Mild □ Strong	☐ 3.1 - 12.4 ☐ ≥ 12.5 ☐ N/A ★ N/D

		1			
BFI WASTE CO	ODE				
AINS		6. SPECIAL WASTE CON	POSITION		

4. REACTIVITY		5. THIS WAS	STE CONTAINS		6. SPECIAL WASTE COMPOSITION			
Note if the waste exhibits any of the following reactive properties: Water Reactive Acid Reactive Alkaline Reactive Oxidizer Autopolymerizable Pyrophoric Explosive Thermally Sensitive Shock Sensitive		Note if the waste cont If any are checked "You (if applicable) and inc as part of the waste comparison Free Liquids Free Cyanide Free Sulfide Free Ammonia Dioxins Organic Solvents Virgin Oils Used Oils	es", specify type clude its concentration	es es als erials ted		Concentration ranges are suggested must be identified in percentages (% parts per million (ppm). Attach additionecessary. Components SAND CLAY Bentance	6) and/or	
•	ĺ.,.							
						·		
		7. TRAN	ISPORTATION INFO	RMATIO	<u> </u>			
It the waste is a DOT Hazardous Proper USDOT Shipping Name:						•		
USDOT Hazard Class:		UN or N	IA Number:			CERCLA Reportable Quantity:		
		8. SUP	PPLEMENTAL INFOR	MATION			ţ.	
☐ None ☐ MSD Sheets ☐ Other - describe:		☐ Analytical Data	☐ Chain of Custo	ody		Memo/Letter ☐ Waste Compos No. of Pages		
<u> </u>		9. GEN	NERATOR'S CERTIF	ICATION				
I hereby certify that the above and attached description is complete and accurate to the best of my knowledge and ability to determine, that no deliberate or willful omissions of composition or properties exist, that all known or suspected hazards have been disclosed, and that the waste is not a regulated hazardous waste by the USEPA, by an applicable State or Provincial authority, or by any applicable local authority, and does not contain PCBs regulated by TSCA (i.e., 40 CFR 761) or any Provincial authority. GENERATOR'S AUTHORIZED SIGNATORY as identified in Section 1 (c):								
DATE 0	<i>₽.</i>	ENDWAY	SIGNATURE	y	7	1 Jaffurganosival	Masqual.	
		REPRESEN	ITATIVE SAMPLE CE	RTIFICA	ATIO	DN		
This Section is to be completed t	oy th			·····				
	ana	alytical data was provide	ed on the waste descr			is representative of that waste and wa	is collected	
Lab sample assigned to:		Anni Winters with the same and	(peel	off label	i)			
Collector's Name: T. C.B	25	MANON						
Signature: T.C.B.		<u> </u>						
Company: Acorascas	_	•	<u> </u>					
Title: Envisonment			<u> </u>					
Telephone Number: (216) 83		-6120 EX1.50	010					
Date Collected: \\30\9								

CLIENTSAMPLE IDENTIFICATION

AB61409 DEWATERED CLARIFIER SL

95875499

LAB ID NO.

95 875499

RECEIVED

01/31/95 REPORTED

02/13/95

01/30/95

DATE SAMPLED

5499 00000

AMERICAN STEEL FOUNDRIES

RESULT UNITS

TIME

09:30

TCLP EXTRACTION PROC	FINAL PH=5.09			MG/L % MG/L % MG/L % MG/L
TCLP METALS & BIAS %				
ARSENIC	<0. 5	0. 0	5. 0	MG/L
Spike recovery	116			%
BARIUM	<0. 5	0. 0	100.0	MG/L
Spike recovery	102			7.
CADMIUM	<0.05	0. 0	1.0	MG/L
Spike recovery	95			7.
CHROMIUM	<0.05	O. Ø	5. O	MG/L
Spike recovery	97			~ /
SELENIUM	<0. 25	0. 0	1.0	MG/L
Spike recovery	112			%
MERCURY	© CO. 002	0. 0	0. 2	MG/L
Spike recovery	112			%
LEAD	<0.2	0. 0	5. 0	MG/L
Spike recovery	100			%
SILVER	<0.2	0.0	5. O	MG/L
Spike recovery	78			7.
TCLP SUPPL. METALS		· ·		3
NICKEL	<0.2			MG/L
Spike recovery	90			7.
COPPER	<0.05			MG/L
Spike recovery	90			7.
TCLP VOA'S & BIAS %				
METHOD NUMBER	8240			3
VINYL CHLORIDE	<0.002	O. O	0. 2	MG/L
Spike recovery	98			%
1,1-DICHLOROETHYLENE	<0.002	0.0	0. 7	MG/L
Spike recovery	96			%
METHYL ETHYL KETONE	<1.0	0. 0	200	MG/L
Spike recovery	105			%
CHLOROFORM	<0.002	0. 0	გ. 0	MG/L
Spike recovery	94	<u> </u>	 –	MG/L MG/L MG/L MG/L MG/L MG/L MG/L MG/L
CARBON TETRACHLORIDE	<0.002	0. 0	0. 5	MG/L
Spike recovery	100			%
BENZENE	<0.002	0. 0	0. 5	MG/L
Spike recovery	78			%
1,2-DICHLOROETHANE	<0.002	0. 0	0. 5	MG/L

-- DIRECTORS --Patrick K. Jaynes Ph.D. hony Nasrallah Ph.D.



BFI WASTE SYSTEMS WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 **ATWATER** OH 44201

CLIENTSAMPLEIDENTIFICATION

AB61409 DEWATERED CLARIFIER SL

95875499

LAB ID NO.

TIME

95 875499 RECEIVED

09:30

01/31/95 REPORTED

5499

DATE SAMPLED

01/30/95

00000

02/13/95

AMERICAN STEEL FOUNDRIES

ences in the second of the second
Spike recovery
TRICHLOROETHYLENE
Spike recovery
TETRACHLOROETHYLENE
Spike recovery
CHLOROBENZENE
Spike recovery 1.4-DICHLOROBENZENE
Spike recovery
TCLP BNA'S & BIAS %
METHOD NUMBER
CRESOLS
Spike recovery
2,4-DINITROTOLUENE
Spike recovery
HEXACHLOROBENZENE
Spike recovery
HEXACHLOROBUTADIENE
Spike recovery
HEXACHLORGETHANE
Spike recovery
NITROBENZENE
Spike recovery
PENTACHLOROPHENOL
Spike recovery PYRIDINE
Set is
Spike recovery 2,4,5-TRICHLOROPHEN
Spike recovery
2,4,6-TRICHLOROPHEN
Spike recovery
TCLP REVIEW

RESULT	De la Company	RENCE LIMIT	UNITS 1. S
9 8			%
<0.002	0. 0	0. 5	MG/L
102			%
<0.002	0. 0	0. 7	MG/L
103			7.
<0.002	0. 0	100.0	MG/L
98			%
<0.002	0. 0	7. 5	MG/L
99			%
8270			
<0. 1	0. 0	200	MG/L
88			74
<0.1	0. 0	0.13	MG/L
66		-	7.
<0. 1	0. 0	0.13	MG/L
91	8		%
<0. 1	Q. Q	O. 50	MG/L
80	0.0		% ***
<0. 1 62	0. 0	3. 0	MG/L
<0.1	0. 0	2. 0	% MG/L
80	U. U	5 V	%
<0.1	0. 0	100.	MG/L
74			7.
<0. 1	O. Q	5 . 0	MG/L
40			%
<0. 1	0. 0	400.	MG/L
82			%
<0. 1	0.0	2. 0	MG/L
74			%
•			
•			

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24,1992 (57FR55114) REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

COMPLETED 02/03/95

ZERO HEADSPACE EXTRT

--- DIRECTORS --Patrick K. Jaynes Ph.D. thony Nasrallah Ph.D.



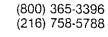
BFI WASTE SYSTEMS WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 ATWATER OH 44201

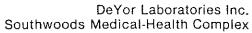


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SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY BROWNING-FERRIS INDUSTRIES

	Location:	Willow	cree K	···	Client#	623		
	Billing Contr	rol #(Lab use	only)	15-2763	322			
	Purchase O	rder#	21	92090				
	Generator/P	roject#	America	en 552	el For	indries		
	LAB ID#	875499			AB 61			
	Waste Desc Number of o Matrix	ription: containers Soil	De Wa.T.			Slude Organic/o		
553 546 548 544 585 578 581 1002 1003 859 511 569 502		Metals + sp Supplements UST Priority Volatiles + Semi-volatile Pesticides/H Reactivity S Corrosivity S	etion pace Extraction pace Extraction pike recoverie al metals + Panel (Metal spike recovers + spike re es + spike re derbicides + s creen Screen eum Hydroca	es spikes(Coppo Ils + TPH + F cries coveries pike recoveri	Rush Service	Y . (N)	900.00 3,11	1,001. "
ample Tak	en By:		Date	Time	Company			
Jerry	BraDwi	a y	1-30-85	5:30 Hz	A. S. E	<i></i>		
attiple out	mitted by:							
ample Co	uriered By:			I				
837	H.		1/31/95	1130/AM	Dogok	y		
ample Red	ceived By:		-	<u> </u>				
Dening	Brody	<u> </u>	1-31-95	1300	DeYor Lal	ooratories		







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SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY BROWNING-FERRIS INDUSTRIES

	Location:	Willow	creek		Client#			
	Billing Cont	trol #(Lab use	only)					
	Purchase C	rder#	21	92090				
	Generator/I	Project#	America	en Sta	el Fou	ndries		
	LAB ID#			WCD #	AB 614	109		
	Waste Des	cription:	Dewal	ered Ci	arifier	Sludge	7	
	Number of	containers				0		
	Matrix	Soil	X_Solid	Multipha	se	Organic/oi	l	
	ANALYSES	REQUESTED)		RUSH	Y (N)		
553		TCLP Extrac						e i
546			pace Extracti	on			Ø	'
548			pike recoveri				900.00 /	" الأوا
544			al metals +		er & Nickel)		500· W	107
585					Rush Service)	\$	Tope	lo,
578			spike recove		10311 001 11001		را ل	
582			es + spike re			{5	γ ¹ '	
581			lerbicides + s		íae	Р		
1002		Reactivity S		pine recover				
1003		Corrosivity						
859		_ lgnitability	0010011					
511		- -	eum Hydroca	rhons(TPH)				
569		BETX	001111111000	3700113(1111)				
502		PCB(soil)						
		Other						
245	X	_Signatory R	eview					
		_						
Sample Tak	en By:		Date	Time	Company			
	2 0				.,,			
1 eyry	<u>/3raθω</u> omitted By:	"ay	1-30-55	7.30 NE	A.S.F.			
Sample Sub	omitted By:	•	1	r · · · · · · · · · · · · · · · · · · ·				
Sample Cou	uriered By:			<u> </u>	L			
9/m	IA.		1/31/95	1130/	TROJOR			
705 //	noised Diss		/ / "	AM		-		
Sample Rec	erved by:							
					DeYor Lab	oratories		
			1	<u> </u>				



WASTE APPROVAL FORM

Date

: 02/15/95

BFI Location

: Willowcreek Landfill

BFI Initiator

: Casanta, Al

Generator

: American Steel Foundries

Generator Location: Alliance, OH

WCD Number

: AB61410

BFI Number

: 203177

WASTE DESCRIPTION:

Lamps, Flourescent

SAFETY PRECAUTIONS: Avoid Skin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Burial

Facility...

Glenwillow Landfill

Northern Ohio Landfill Willowcreek Landfill Mahoning Landfill

COMMENTS:

WCD updated January 31, 1995.

This waste has the potential to cause dusting problems.

The following items were received by the Corporate Waste Approval Group:

- a. Analytical data from DeYor MetPath Laboratories
- b. Chain of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above.

This waste stream has been assigned BFI Waste Code: OH/217;218;219;855/960323/203177

Corporate Waste Approval Group

Diana L. Lasco

Technical Representative



0H 211,218,219,196323 203177 BFI WASTE CODE 355

WASTE APPRO	DVAL REQUEST
BFI to complete this area.	
BFI Initiator: A/ CasanTa	Action Requested: New Waste Approval
Location: /sf.//swefeek/ peessillou	ØUp-Date Approval - Previous Number: 203/77
Company Number: 215 611	Disposal Site Requested: 217 218 219 226 856
Telephone: \$76) 947-2547	Disposal Site Requested: 211 718 219 776 856 Company Number:
Fax: 6216-7 947-2124	Management Method Requested:
Fax: 6167 947-2724 Date: 1-30-96	☐ Other
Date.	
	TERIZATION DATA L WASTE
IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATI INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO LEGIBLY PRINTED IN INK, AND SIGNED.	
1. GENERATO	DR INFORMATION
a) Generator's Name: Amzaican Steel Foundards	e) State/Provincial/Local Registration No.:
b) Generating Facility's Address: 1001 C. Bronder	Generator's EPA Id. No.: OHD981090418
City: Allicy s Addiess: 1507 Estate: OH Zip: 44601	Industry Description/SIC Code: 3335
c) Generator's Representative: T.C.BRacom and	
Title: Forgooment MANACL	f) Customer's Name: Samo
Telephone: (2.1) 823-6150 847. 206	g) Customer's Mailing Address:
Fax: (21L) 821-4568	City: State: Zip:
d) Emergency/Information Contact: Same as Roovs	h) Representative:
Title:	Telephone: ()
Telephone: ()	Fax: ()
2. GENERAL WASTI	STREAM INFORMATION
D C14-000	CONTINUE ROLLS
a) Name/Description of The Waste: <u>Broken テレdoRES</u> b) Process Generating Waste: <u>ELをCVにいたい</u> ひまみ	The Tone
b) Process Generating Waste:	WHILL (WHIMIENUMED)
	the state of the s
c) Is this a treatment residue of a waste which was previously a restricted	
If yes, describe the waste and the process generating the waste prior to	
d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Re	
If yes, enter the Waste Identification Number if one has been assigned:	
	Control Waste" as defined by State, Provincial, or local Regulations?
□ No If yes, enter Waste Identification Number: 19 Per 19 P	
f) Recommended personal protection equipment and special handling pro	cedures: Non-
g) Anticipated Volume: \ \C\\	S Cubic Yards □Tons □Gallons □Cubic Meters □Tonnes(metric)
	One Time Other
To be transported in: Stabulk Drums (type/size)	Other
h) Is a representative sample included? Tayes I No	
	DODEDTICS AT 700F
3. WASTE PI	ROPERTIES AT 72°F
a) Physical State:	e) Density Range: to
Solid ☐ Semi-solid	X N/D ☐ lbs/gal. ☐ g./cc.
☐ Powder ☐ Liquid	☐ lbs./yd. ³ ☐ Kg/m ³ ☐ Other
☐ Combination	
b) Layers:	f) Flash Point, °F:
Single-layered ☐ Bi-layered ☐ Multi-layered	□≤72 □73-100 □101-14 9
c) Colors(s):	□ 141-200 □≥ 201 X N/A X N/D
Describe WHITE	, ACD
d) Odor:	g) pH:
Describe	. □ ≤ 2 □ 2,1 - 5.0 □ 5.1 - 9.0
None ☐ Mild ☐ Strong	□ 9.1 - 12.4 □ ≥ 12.5 □ N/A 🕱 N/D
1	-

BFI WASTE CODE

4. REACTIVITY	5. THIS WASTE CONTAINS	6. SPECIAL WASTE COMPOSITION
Note if the waste exhibits any of the following reactive properties: Water Reactive Acid Reactive Called Alkaline Reactive Called Autopolymerizable Pyrophoric Explosive Thermaily Sensitive Shock Sensitive None of the above	Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6. Free Liquids	Concentration ranges are suggested and units must be identified in percentages (%) and/or parts per million (ppm). Attach additional pages if necessary. Range Components Min. / Max. Courses Floorescent Bules 100 %.
	7. TRANSPORTATION INFORMATI	ON ಸ್ಥಾಪ್ರೀಸ್ ಸ್ಟ್ರಾಪ್ಟ್ ಮಾಡ್ಗಳು ತಮ್ಮ ಸ್ಥಾಪ್ಟ್ ಬ್ರ
If the waste is a DOT Hazardous Proper USDOT Shipping Name: USDOT Hazard Class:		CERCLA Reportable Quantity:
	8. SUPPLEMENTAL INFORMATION	ON THE STATE OF TH
☐ None ☐ MSD Sheets ☐ Other - describe:	Analytical Data	☐ Memo/Letter ☐ Waste Composition No. of Pages:
	GENERATOR'S CERTIFICATIO	N TO THE PART OF T
deliberate or willful omissions of	nd attached description is complete and accurate to the composition or properties exist, that all known or suspect by the USEPA, by an applicable State or Provincial auti	best of my knowledge and ability to determine, that no cted hazards have been disclosed, and that the waste is
contain PCBs regulated by TSCA	SIGNATORY as identified in Section 1 (c):	
contain PCBs regulated by TSCA GENERATOR'S AUTHORIZED	SIGNATORY as identified in Section 1 (c):	TITLE MANAGER
contain PCBs regulated by TSCA GENERATOR'S AUTHORIZED	SIGNATORY as identified in Section 1 (c):	TITLE
contain PCBs regulated by TSCA GENERATOR'S AUTHORIZED S 1-31-55 TC OF DATE	SIGNATORY as identified in Section 1 (c): REOWAY T.C.B.J.F. PRINT NAME SIGNATURE	TITLE
contain PCBs regulated by TSCA GENERATOR'S AUTHORIZED STATE DATE This Section is to be completed by I certify that the sample for which	SIGNATORY as identified in Section 1 (c): REPRESENTATIVE SAMPLE CERTIFIC	TITLE CATION ped waste.
contain PCBs regulated by TSCA GENERATOR'S AUTHORIZED STATE DATE This Section is to be completed by I certify that the sample for which	SIGNATORY as identified in Section 1 (c): PRINT NAME REPRESENTATIVE SAMPLE CERTIFIC by the person obtaining the sample of the above describe an analytical data was provided on the waste described at istent with accepted technical standards. (peel off late STEEL FOUNDARY MANAGER	TITLE CATION ped waste.

GLIENT SAMPLE IDENTIFICATION

AB61410 CRUSHED FLOURESCENT LA

95875500

95 875500

RECEIVED

LAB ID NO.

01<u>//31/9</u>5

UNITS:

MG/L %

MG/L

MG/L

MG/L

MG/L

MG/L

MG/L

χ

7 MG/L

7.

7

%

%

02/10/95

DATE SAMPLED

01/30/95

5500 RESULT

00000

AMERICAN STEEL FOUNDRIES

TCLP EXTRACTION PROC

TCLP METALS & BIAS %

Spike recovery

TCLP SUPPL METALS

Single Control Control

ARSENIC

BARIUM

CADMIUM

CHROMIUM

SELENIUM

MERCURY

LEAD

SILVER

NICKEL

COPPER

TCLP REVIEW

FINAL PH=5.15

<0.5 112 0. B 100

< 0.05 91

CO. 05 96 CO. 25

0.175

87

90

112 104

CO. 2-96

<0.2

<0.2

1.20 85

TIME

09:30

0.0 5.0 0.0 100.0

1.0 0.0

0. Q 5.0 0.0 1.0

0.0 0.2

0.0 5.0

0.0

5.0

MG/L

% MG/L

7.

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24, 1992 (57FR55114) REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

--- DIRECTORS ---

Patrick K. Jaynes Ph.D.

f thony Nasrallah Ph.D.

Laboratories CORNING Company

7655 Market Street, Suite 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 365-3396

BFI WASTE SYSTEMS WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 **ATWATER** 44201 OH

Reference limit is provided for convenience: It may no apply to every hazard assessment. Be certain



7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY BROWNING-FERRIS INDUSTRIES

	Location:	Willow	Icreek	<u> </u>	Client#	623		
	Billing Conti	rol #(Lab use	only)	95.276	321			
	Purchase O	rder#	21	92091	College of the	<u> </u>		
	Generator/P	roject#	Americ	an 51	Teel F	oun Dro	6	
	LAB ID#	87550	00	WCD #	AB 61	410		
	Waste Desc	ription:	Crushe	D Flow	escent L	omps		į
	Matrix	Soil	Solid	Multipha	se	Organic/	oil	
553		REQUESTED TCLP Extrac		•	RUSH	Y . (N)	300.00	. 400·10
546		•	ace Extracti	on			7 × 1	
548	<u> </u>		ike recoverie			χ.	200.	ENEROY
544				spikes(Copp			الم)
585		-		ıls + TPH+1	Rush Service	e)	Dr.	
578		_	spike recove					
582		-	es + spike re				-	
581		_		pike recoveri	ies			
1002		Reactivity S						
1003		Corrosivity	Screen					
859		_lgnitability		TOLD				
511			eum Hydroca	arbons(iPH)				
569		BETX						
502		PCB(soil)			••			
	· · · · · · · · · · · · · · · · · · ·	Other						
245		_Signatory R			_			
Sample Tak	en By:		Date	Time	Company			
Tem	Brad	Puray	1-30-85	5:30 pm	HS E			
Sample Súb	omitted By:		ī	1	1		· · · · · · · · · · · · · · · · · · ·	
Sample Cou	uriered By:		, /		Ĭ			•
136	MAZ	TW	1/31/95	1130 Jan	Degos	<u> </u>		
Sample Rec	eived By:		· · · · · · · · · · · · · · · · · · ·	γ				
Dening	Brader		1-31-95	13:00	DeYor La	boratories		
···								

53-R4505 (REPRINT)
1 (TS WASHER SERVICE
FJJID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE COMPLETED: 12/22/94 REVISED:

RUN: 01/25/95

ACCEPT FOR SHIPMENT

RANCH/SUBMITTER: 404003 AKRON

CONTROL #: LAB #: SAMPLE #:

234928-3 42231-1 344271

GENERATOR INFORMATION: CUSTOMER NUMBER: 4040-03-9881

AMERICAN STEEL FOUNDRIES 1000 E BROADWAY ALLIANCE, OH 44601

ATTN: TERRY BRADWAY

BRANCH: 404003 - AKRON

GENERAL DESCRIPTION: KEROSENE DIESEL FUEL OIL
NATURE OF BUSINESS: FOUNDRY
FACILITY ADDRESS: MANIFEST BILLING
1000 E BROADWAY STATUS: LOG BILLING ADDRESS: ALLIANCE, OH 44601
PROCESS DESCRIPTION: DRAIN EQUIP
GENERATION AMOUNT: 55 GAL 55 GALLONS YEARLY CONTACT: TERRY BRADWAY
CORPORATE REVIEW:
DISPOSITION: ACCEPT FOR SHIP
REVIEW DATE: 12/22/1994
APPROVED FACILITIES: DATE SURVEY SIGNED: 12/06/94 TITLE: ENV COOR PHN: 216-823-6150 PART NUMBER: 0082101 WASTE, SPEC. FUELS-55 REVIEWERS: MJK SAFETY-KLEEN CORP. 633 E 138TH ST DOLTON, IL 60419 ILD980613913 SAFETY-KLEEN CORP. 3700 LAGRANGE ROAD SMITHFIELD, KY 40068 KYD053348108 FED EPA#: STATE EPA#: STATE EFAT: 7088494834 TELEPHONE: 7088494834 STATE AUTH: 000161 APPROVED DOT - SHIPPING DESCRIPTION 0001130 DRUM OR BULK RO W. (ALI 3 UN 0310690006 5028452453 RO WASTE PETROLEUM DISTILLATES, N.O.S (ALIPHATIC AND AROMATIC HYDROCARBONS) 3 UN1268 PG II (D001)(ERG#27) US EPA WASTE CODES: D001 USA REVIEW COMMENTS: THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE HAS THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4505 (REPRINT) PREQUALIFI PARTS WASHER SERVICE FLUID RECOVERY SERVICES	ICATION EVALUATION PAGE 2 OF 3 COMPLETED: 12/22/94 REVISED:
ACCEPT FOR SHIPMENT	RUN: 01/25/95
NCH/SUBMITTER: 404003	COMPLETED: 12/22/94 REVISED: RUN: 01/25/95 CONTROL #: 234928-3 LAB #: 42231-1 SAMPLE #: 344271
GENERAL ANALYSIS OF TOTAL SAMPLE COLOR : ORANGE WATER CONTENT : 1.9 WI NON-VOLATILE RESIDUE: 43.9 WI FLAMMABILITY : FLASHED AT FLAMMABILITY : FLASHED AT PH : EXTRACT BY RADIOACTIVITY : NONE DETECTS	T8 TS DESCRIPTION, OIL
FUEL EVALUATION OF TOTAL SAMPLE HEAT CONTENT : 19400 BT TOTAL BROMINE BR < 0.1 TOTAL FLUORINE F < 0.1	TU/LB ASH UPON COMBUSTION : 0.7 WT% TOTAL CHLORINE CL: < 0.1 WT% TOTAL SULFUR S: < 0.1 WT%
	OSITION BY: APPEARANCE TOTAL (VOL%) (WT%)
AQUEOUS PHASE (FREE WATER)ORGANIC PHASE (FEEDSTOCK)BOTTOM SLUDGE (SEMISOLIDS)BOTTOM SOLID (SETTLED SOLIDS)	100.0 100.0
AQUEOUS PHASE (FREE WATER)ORGANIC PHASE (FEEDSTOCK)BOTTOM SLUDGE (SEMISOLIDS)BOTTOM SOLID (SETTLED SOLIDS)	100.0 100.0 100.0 100.0 100.0
TOTAL	
TOTAL	100.0 100.0 .820 VISCOSITY (CENTIPOISE): < 50 CPS
TOTAL PHASE SPECIFIC GRAVITY: SPECIFIC COMPOSITION OF TOTAL SAMPLE	.820 VISCOSITY (CENTIPOISE): < 50 CPS E COMPOSITION OF: TOTAL TOTAL SAMPLE SAMPLE

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4505 (REPRINT) PARTS WASHER SERVICE FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 3 OF 3 COMPLETED: 12/22/94

REVISED: RUN: 01/25/95

CONTROL #:

234928-3 42231-1 344271

ANCH/SUBMITTER: 404003 ...RON

ACCEPT FOR SHIPMENT

LAB SAMPLE #:

VOLATILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY SAMPLE PREPARATION METHODS: NEAT

DETECTION METHODS COMPOUND NAME HIGH-BOILING ALIPHATIC HYDR		COMPOSITION OF:	VOLATILE ORGANICS (WT%) 56.3	TOTAL SAMPLE (WT%) 30.5
CODE: HHC CAS NUMBER: MEDIUM-BOILING ALIPHATIC HY	DROCARBONS (C	9-C13)	29.9	16.2
CODE: MHC CAS NUMBER: LOW-BOILING ALIPHATIC HYDRO CODE: LHC CAS NUMBER:	CARBONS (C5-C)	8)	10.3	5.6
XYLENES (ORTHO-, META-, AND CODE: XYLS CAS NUMBER:	PARA-)		1.6	0.9
TOLUENE CODE: TOL CAS NUMBER:			1.4	0.8
TOTAL OTHERS (<1.0% EACH) CODE: TO CAS NUMBER:	100-00-3		0.5	0.3
TOTAL			100.0	54.2

SPECIFIC ORGANIC COMPOSITION
POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

LABORATORY REVIEW: A RELEASED: 12/20/94 SEG CODE: REVIEWERS: TLM TLM LAB: PREQ NEW CASTLE ANALYZED: 12/20/94 SUBMITTED: 12/12/94

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED.

*** ACCEPT FOR SHIPMENT

END OF DOCUMENT

81363-R4505

SAFETY-KLEEN CORP NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

EPA ID: KYD053348108

PAGE

TO: SAFETY-KLEEN CORP. 3700 LAGRANGE ROAD SMITHFIELD, KY 40068

UNDER MANIFEST NUMBER
THE GENERATOR NOTED BELOW IS SHIPPING TO YOU A RESTRICTED WASTE UNDER FEDERAL AND STATE LAND DISPOSAL RESTRICTION REGULATIONS.
IN ACCORDANCE WITH THESE REGULATIONS, THE GENERATOR HEREBY PROVIDES NOTICE THAT THE WASTE IS RESTRICTED AND THE EPA WASTE CODES AND APPROPRIATE TREATMENT STANDARDS ARE AS FOLLOWS:

HAZARDOUS WASTE CODES: D001

TREATABILITY GROUP: NONWASTEWATERS

WASTE DESCRIPTION AND TREATMENT/REGULATORY SUBCATEGORY WASTE CODE HIGH TOC IGNITABLE CHARACTERISTIC WASTE. HIGH TOC IGNITABLE LIQUIDS SUBCATEGORY. D001 D001

TREATMENT STANDARD CONCENTRATION OR TECHNOLOGY CODE RORGS; OR CMBST ** FSUBS; RORGS; OR INCIN***

NOTES:

* THESE TREATMENT STANDARDS DO NOT PRECLUDE SOLVENT RECOVERY OR
USE AS FUEL PRIOR TO LAND DISPOSAL.
** NEW TREATMENT STANDARDS UNDER FEDERAL RULES EFFECTIVE 12-19-94.
*** TREATMENT STANDARDS APPLICABLE IN CERTAIN HSWA-AUTHORIZED STATES.
*** AND MEET UNIVERSAL TREATMENT STANDARDS EFFECTIVE 12-19-94.

All the state of t	THROUGH EFFECTIVE 12-19-95	Ł.
GENERATOR NAME: American Steel Found	KRIES EPA II).	
GENERATOR SIGNATURE (OPTIONAL):		
NAME & TITLE (OPTIONAL):		
SAFETY-KLEEN SAMPLE NUMBER: 344271	CONTROL NUMBER:	234928-3

81363-R4505

SAFETY-KLEEN CORP. NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP. 3700 LAGRANGE ROAD SMITHFIELD, KY 40068

EPA ID: KYD053348108

UNDER MANIFEST NUMBER
THE GENERATOR NOTED BELOW IS SHIPPING TO YOU A RESTRICTED WASTE UNDIFICED FEDERAL AND STATE LAND DISPOSAL RESTRICTION REGULATIONS.
IN ACCORDANCE WITH THESE REGULATIONS, THE GENERATOR HEREBY PROVIDES NOTICE THAT THE WASTE IS RESTRICTED AND THE EPA WASTE CODES AND APPROPRIATE TREATMENT STANDARDS ARE AS FOLLOWS: LINE NUMBER RESTRICTED WASTE UNDER

HAZARDOUS WASTE CODES: D001

TREATABILITY GROUP: NONWASTEWATERS

EPA WASTE WASTE DESCRIPTION AND TREATMENT/REGULATORY SUBCATEGORY CODE D001 HIGH TOC IGNITABLE CHARACTERISTIC WASTE. HIGH TOC IGNITABLE LIQUIDS SUBCATEGORY. D001

TREATMENT STANDARD CONCENTRATION OR TECHNOLOGY CODE RORGS; OR CMBST ** FSUBS; RORGS; OR INCIN***

NOTES:

* THESE TREATMENT STANDARDS DO NOT PRECLUDE SOLVENT RECOVERY OR USE AS FUEL PRIOR TO LAND DISPOSAL.

** NEW TREATMENT STANDARDS UNDER FEDERAL RULES EFFECTIVE 12-19-94.

*** TREATMENT STANDARDS APPLICABLE IN CERTAIN HSWA-AUTHORIZED STATES.

****AND MEET UNIVERSAL TREATMENT STANDARDS EFFECTIVE 12-19-94.

CHINESE ATTORNEY		Prince IV-IA-18-18	4.
GENERATOR NAME: AMER	ican Steel Foundale	EPA ID:	
GENERATOR SIGNATURE (OPTIONAL)	•	BLA ID:	
NAME & TITLE (OPTIONAL):			
SAFETY-KLEEN SAMPLE NUMBER:			
THE WINDER OWNERS NOWBER:	344271	CONTROL NUMBER	224020 2

safety-lieen . MATERIAL SURVEY

SK	USE	ONLY

SAFETY-KLEEN CUSTOMER NUMBER

SK	Survey	No.

344271

SK USE ONLY

Control No	,	

	LINE OF BUSINE	ESS_		Lab No		
А	Generator Name American Steel Francis					
	Nature of BusinessS.f.C. No					
	ID Numbers: Federal EPA State ID			State	· 10	
	Status: Large Quantity Generator (LQG) Small Quantity Generator	erator	(SQG) Cond	ditionally Exempt	Small Quantity Gene	ator (CESQG)
В	Facility Street Address (No P.O. Boxes) Manifest Address		Billing Name &	Address (If Diffe	erent) Mar	ifest Address
	1000 E Fooding					
7232	City ½ / / / State / ○ / Zip / ½/()		City		State	Zip
	General Description of Material Process Description Generation Amount Gallons Per Week Month Quarter Year One Time Only Gallons On Hand Drums Bulk Shipping Schedule Physical Description: Color: Percent Solids that Could Not be Sampled pH Range <= 2.0 2-4 4-10 10-12.5 >= 12.5 Layers or Phases Physical State Liquid Paste Solid Liquid Viscosity Attach material safety data sheets (MSDS) for material components and ar MSDS attached EP Toxic analysis attached TCLP are		rent EP Toxic, TCLP	pical should not		Typical
	Yes No DOT Radioactives, Explosives, or materials forbidden from the Yes No TSCA regulated materials, Chlorinated biphenyls (PCB), Bron Yes No Products used as pesticides, herbicides, insecticides or by-products used as pesticides, herbicides, insecticides or by-products. No Reactive components (Sulfides, Cyanides, Shock sensitive models of No Biological hazards (such as Pathogenic materials, Infectious Determine if any of the following restricted substances may be in the root of No Toxic metals (Arsenic, Barium, Beryllium, Cadmium, Chromium, Chromium, No Water or amine-reactive components (such as unreacted Isoc	anspo ninate roduc 6HA (I ateria agent mater	ort. ad biphenyls (PBB), C is of pesticide manufa Ref. 29 CFR 1910.100 Ils, Pyrophoric compo s, Etiologic agents, U Ilal, MUST BE COMPI cead, Mercury, Nickel,	chlorinated diben acture. 01-). JSEPA Medical V LETED! Selenium, Silve	Vaste). r, Thallium).	des).
G	DOT Hazardous Material Description Proper Shipping Name		Reportable Quar	ntity (Lbs): 5	000 🗆 1000 🗀 100	□ 10 □ 1
	Hazard Class UN/NA Number		.g □	Not DOT Hazar	dous Material 🗓 N	ot sure
	K USE ONLY Accepted for Analysis Accepted Condition	ally	Suspended for	i More Informatio	n Rejected	
•						
			Safety Evaluated By		Date 3	

SK Survey No. EPA Waste Description and Treatment Standards (COMPLETE ALL QUESTIONS WITHIN ONE SECTION ONLY). 344271 IS THIS MATERIAL A RCRA "HAZARDOUS WASTE"? (Ref. 40 CFR 261) BOX ON LEF 1. For hazardous wastes, if waste is a "listed" waste, such as "spent solvent" (F001-5), then show the applicable EPA Waste Codes: ☐ F001 ☐ F002 ☐ F003 ☐ F004 ☐ F005 ☐ F006 ☐ K086 ☐ Not Applicable For all hazardous wastes, the generator must determine if waste exhibits a characteristic of a hazardous waste, either based on knowledge or testing. Based on this determination, show all applicable EPA Waste Codes. ☑ D001 ☐ D002 ☐ D003 ☐ D004 ☐ D005 ☐ D006 ☐ D007 ☐ D008 ☐ D009 ☐ D010 ☐ D011 Not Applicable (Ref. 40 CFR 268) Mot sure Yes No 3. Based on Land Disposal Restrictions, does waste have a technology-based treatment standard? If yes, then show all applicable technology codes: DEACT -□ RORGS ☐ FSUBS ☐ INCIN Other, specify_ 4. List all applicable State Waste Codes required by generating facility state: ☐ None required ☐ Not sure SECT 1. Is this material exempt from waste regulations under RCRA (i.e., not a "solid waste")? (Ref. 40 CFR 261) ☐ Yes (Skip to 5) ☐ No 2. Is this waste an "used oil" (used petroleum oil) for fuel or recovery, not disposal? (Ref. 40 CFR 279) Yes (Skip to 5) 3. Is this waste exempt from regulation as a hazardous waste? If yes, explain why in Comments Yes (Skip to 5) ☐ No 0 N 4. For all other "non-hazardous" wastes, submit survey with Toxicity Characteristic Leaching Procedure (TCLP) analysis results. If TCLP analysis is not available, then contact a Safety-Kleen representative about obtaining this analysis. List all applicable State Waste Codes required by generating facility state: None required ■ Not sure SEC Show SK Codes for all regulated chemicals listed in the Reference Table on the back page which can be present in material, even in trace amounts. NOT SURE N Are any of these chemicals used as solvents? □ No ☐ Yes ☐ No Are these solvents used to remove oil, grease, or wax? H-3 Safety-Kleen Corp. requires a representative sample and charges a fee for the prequalification of all new material. P.O. No. From Line Type of sample: Composite of drums Sample taken by Customer Safety-Kleen Representative Generator Certification (Not a waste handling agreement): On behalf of the Generator, I hereby warrant, represent, and certify that: all information submitted in this document is true, accurate, and complete; all known or suspected hazards have been disclosed; and, I am a duly authorized employee of the Generator, Generator agrees to indemnify and hold Safety-Kleen Corp. and its subsidiaries harmless for any claims, liabilities, damages, and costs including, but not limited to, attorney's fees, arising out of or in any way related to breach of the above warranty by the Generator. ERRU Name Phone (2 (6) 823-6150 Signature . Date Phone (2/6) 1923-615-6 Contact itle 3012 Sales Representative Name Number Sample leaked in transit Survey number did not match sample label Survey information incomplete Sample Received Completed Survey Received Survey Logged Comments Analysis Entered By Data Verified By

SAMPLE DEWN No. 325 81363-R4505 (REPRINT) OIL RECOVERY SERVICE OIL SERVICES FUEL

PREQUALIFICATION EVALUATION

COMPLETED: 01/18/95 REVISED:

RUN: 01/23/95

ACCEPT FOR SHIPMENT

NCH/SUBMITTER: 404003 AKRON

CONTROL #: LAB #: SAMPLE #:

235516-9 42851-6 344272

GENERATOR INFORMATION: CUSTOMER NUMBER: 4040-03-9881

AMERICAN STEEL FOUNDRIES 1000 E BROADWAY ST ALLIANCE, OH 44601

ATTN: TERRY BRADWAY

BRANCH: 404003 - AKRON

GENERAL DESCRIPTION: OIL H2O
NATURE OF BUSINESS: FOUNDRY
FACILITY ADDRESS: MANIFEST BILL.
1000 E BROADWAY ST
ALLIANCE, OH 44601
PROCESS DESCRIPTION: DRAIN MACHINE
GENERATION AMOUNT: 55 GALLONS YEARLY

BILLING ADDRESS:

STATUS: LQG

DATE SURVEY SIGNED: 12/06/94

TITLE: ENV . COOR

PHN: 216-822-6150

P.O. #: CONTACT: TERRY BRADWAY SURVEY COMMENTS: CHECK FOR SK OILY WATER

* * * ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363+R4505 (REPRINT) OIL RECOVERY SERVICE OIL SERVICES FUEL

PREQUALIFICATION EVALUATION

ΟF COMPLETED: 01/18/95 REVISED:

RUN: 01/23/95

ACCEPT FOR SHIPMENT

NCH/SUBMITTER: 404003 $A \dots RON$

CONTROL

235516-9 42851-6 344272

LAB #: SAMPLE #:

CORPORATE REVIEW:
DISPOSITION: ACCEPT FOR SHIP
REVIEW DATE: 01/08/1995
APPROVED FACILITIES:
BRESLUBE

PART NUMBER: 0082104 WASTE, NON-SPECIFIC REVIEWERS: MJK

SAFETY-KLEEN CORP. 633 E 138TH ST DOLTON, IL 60419 ILD980613913

601 RILEY RD EAST CHICAGO, IN IND07704234

0310690006 7088494850

219-397-1131 000164

SAFETY-KLEEN CORP. 3700 LAGRANGE ROAD SMITHFIELD, KY 40068 FED EPA#: KYD053348108

TATE EPA#: TELEPHONE:

FED EPA#: EPA#:

STATE EPA#: TELEPHONE:

STATE AUTH:

5028452453

STATE AUTH: APPROVED DOT

SHIPPING DESCRIPTION

DRUM OR BULK WASTE OIL AND WATER MIXTURE 0001082 (NOT USDOT HAZARDOUS MATERIAL)

US EPA WASTE CODES: NONE

REVIEW COMMENTS:

OK FOR SKOS WASTE WATER.

OK FOR WASTE WATER FUEL

PROPER SHIPPING DESCRIPTION WAS BASED ON THIS SINGLE ANALYSIS. GENUST CERTIFY THAT SHIPMENT IS NOT HAZARDOUS. PER COMPANY POLICY, CUSTOMERS MUST COMPLETE GENERATOR CERTIFICATION WITH EACH SHIPMENT AND BRANCH WILL FILE IN CUSTOMER RECORDS. GENERATOR

THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE HAS THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4505 (REPRINT) OIL RECOVERY SERVICE OIL SERVICES FUEL	PREQUALIFICATION	EVALUATION	PAGE COMPLETED REVISED	: 01/18/9	
ACCEPT FOR SHIPMENT		CONTI		35516-9	رو
ANCH/SUBMITTER: 404003		SAMI	ADL #: 2 LAB #: PLE #: 3	42851-6 44272	
GENERAL ANALYSIS OF TOTAL COLOR WATER CONTENT NON-VOLATILE RESIDUE: FLAMMABILITY FLAMMABILITY FLAMMABILITY PH RADIOACTIVITY COMMENTS: EMS = YES/AQ	SAMPLE DK BROWN 92.7 WT% 5.5 WT% DESC O FLASH AT 75 F IO FLASH AT 142 F IIRECT BY METER IONE DETECTED LAYER IS GRAY/NVR	CRIPTION: OIL BY SETAFLASH BY SETAFLASH 6.7	OIL		
FUEL EVALUATION OF TOTAL HEAT CONTENT: TOTAL FLUORINE F TOTAL BROMINE BR COMMENTS: NO FLASH ON S	AUVITA OOS	ASH UPON COMBUSTOTAL CHLORINE TOTAL SULFUR HALIDES = 3265P	STION : CL: S:< PM BY HPLC	0.2 WT 0.3 WT 0.1 WT	2000 (20)
METALS CONTENT OF TOTAL SILVER (D011) A ARSENIC (D004) A BERYLLIUM E CADMIUM (D006) CHROMIUM (D007) CHROMIUM (D007) CHROMIUM (D007) CHROMIUM ANGANESE ANTIMONY SANTIMONY STIN THALLIUM THALLIUM ZINC COMMENTS: METALS ON AQ	G: < 10 AS: < 10 AS: < 23 AS: < 40 AS:	ALUMINUM BARIUM (D00 CALCIUM COBALT COPPER MERCURY (D00 MAGNESIUM MOLYBDENUM NICKEL LEAD (D00 SELENIUM (D01 TITANIUM VANADIUM	AL: < < < < > BA: < < < < < < < < < < < < < < < < < < <	10 5 5	
				NCE TOT	
GENERAL COMPOSITION: AQUEOUS PHASE (FREE WATORGANIC PHASE (FEEDSTOO BOTTOM SLUDGE (SEMISOLE BOTTOM SOLID (SETTLED)	TER) CK) IDS) SOLIDS)		92. 8. 0.	, 0 92 0 8 0 0	

.984

ACCEPT FOR SHIPMENT

TOTAL PHASE SPECIFIC GRAVITY:

TOTAL

CONTINUED ON NEXT PAGE

100.0

VISCOSITY (CENTIPOISE): <

100.0

50 CPS

81363-R4505 (REPRINT) OIL RECOVERY SERVICE OIL SERVICES FUEL

PREGUALIFICATION EVALUATION

COMPLETED: 01/18/95 REVISED:

RUN: 01/23/95

ACCEPT FOR SHIPMENT

CONTROL #:

235516-9 42851-6 344272

NCH/SUBMITTER: 404003 ∴ ₹ON

LAB SAMPLE

VOLATILE ORGANIC COMPOSITION OF ORGANIC PHASE BY GAS CHROMATOGRAPHY SAMPLE PREPARATION METHODS: HEXANE-EXTRACT, CS2-EXTRACT DETECTION METHODS: ECD, FID, FID

COMPOSITION OF:

VOLATILE

ORGANICS

COMPOUND NAME PERCHLOROETHYLENE CODE: PERC

CAS NUMBER:

(DØ39)

(PPM) 6.3

TOTAL

127-18-4

6.3

SPECIFIC ORGANIC COMPOSITION
POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

ADDINL ANALYTICAL INFO: TRACE VOLATILE ORGANICS DETECTED

LABORATORY REVIEW: R SEG CODE: REVIEWERS: MG MG LAB: PREQ NEW CASTLE RELEASED: 01/16/95 ANALYZED: 01/16/95 SUBMITTED: 12/29/94 COMMENTS: LOW BTU <5000/ZN <10 PPM

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS NOT REQUIRED.

ACCEPT FOR SHIPMENT

OF DOCUMENT END

81363-R4505 OIL RECOVERY SERVICE CELLOCORE

PREQUALIFICATION EVALUATION MANIFEST INFORMATION

REVISED:

CONTROL SAMPLE RUN: 01/23/95 235516-9 344272

REOUIRED MANIFEST FORM: GN

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT. 1. GENERATORS US EPA NO.!DOCUMENT NO.!2.PAGE! UNIFORM HAZARDOUS WASTE MANIFEST UNDERLINED AREAS ARE REQUIRED GENERATOR NAME AND MAILING ADDRESS STATE MANIFEST DOCUMENT NO CELLOCORE 1341 S CLEVELAND MASSILLON COPLEY OH 44321 B. STATE GENERATOR ID 4. GENERATOR PHONE 216 239 4370 TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP. US EPA ID NO !6. ILD984908202 1D. TRANSPORTER PHONE 2166733340 TRANSPORTER 2 CO NAME 18. US EPA ID NO iΕ. TRANS ID TRANSPORTER PHONE FACILITY NAME AND SITE ADDRESS 10. US EPA ID NUMBER IG. FACILITY STATE ID SAFETY-KLEEN CORP 3700 LAGRANGE ROAD KYD053348108 SMITHFIELD KY 40068 FACILITY PHONE 502 845 2453 II. US DOT DESCRIPTION CONTAINER! I. WASTE NO Α. WASTE OIL AND WATER MIXTURE (NOT USDOT HAZARDOUS MATERIAL) J. ADDITIONAL DESCRIPTION FOR THE MATERIALS LISTED ABOVE HANDLING CODES

15. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION

EMERGENCY RESP# 708-888-4660

SK USE ONLY

344272

safetij-Higen . MATERIAL SURVEY

Ĉ 4 0 − Ø 3 − SAFETY-KLEEN CUSTOMER NUMBER

Control No. SKOJ LINE OF BUSINESS Lab No.

Generator Name American Steel Foundace	5
Em. dasa	S.I.C. No
ID Numbers: Federal EPA State	
Status: Large Quantity Generator (LQG) Small Quantity Generator	
3 Facility Street Address (No P.O. Boxes) Manifest Address	Billing Name & Address (If Different)
1000 E Broadway St	
City Alliance State Ch zip 44601	City State Zip
General Description of Material 011, H ² 0	Material Composition Vol % Wt % Max Typica
Process Description Daun Machine	011
Generation Amount Gallons Per Week Month Quarter Year One Time Only	H70 98%
Gallons On Hand 5 Drums Bulk Shipping Schedule 5 Drums Bulk	
Physical Description: Color: Brn. Grand Percent Solids that Could Not be Sampled	
pH Range	
Physical State Liquid Paste Solid Liquid Viscosity Low Medium High	TOTAL (Typical should not exceed 100%) 100 %
Liquid Viscosity	TOTAL (Typical should not exceed 100%) 100 %
Liquid Viscosity	TOTAL (Typical should not exceed 100%) 100 9 y current EP Toxic, TCLP, or other analysis of the material. nalysis attached Other Analysis attached No attachmen
Liquid Viscosity	TOTAL (Typical should not exceed 100%) 100 9 y current EP Toxic, TCLP, or other analysis of the material. nalysis attached
Liquid Viscosity Low Medium High E Attach material safety data sheets (MSDS) for material components and an MSDS attached EP Toxic analysis attached TCLP at	TOTAL (Typical should not exceed 100%) 100 9 y current EP Toxic, TCLP, or other analysis of the material. nalysis attached Other Analysis attached No attachment naterial, MUST BE COMPLETED! Insport. ninated biphenyls (PBB), Chlorinated dibenzodioxins or furans.
Liquid Viscosity Low Medium High E Attach material safety data sheets (MSDS) for material components and an	TOTAL (Typical should not exceed 100%) 100 9 y current EP Toxic, TCLP, or other analysis of the material. nalysis attached Other Analysis attached No attachment material, MUST BE COMPLETED! unsport. ninated biphenyls (PBB), Chlorinated dibenzodioxins or furans. oducts of pesticide manufacture.
Liquid Viscosity	TOTAL (Typical should not exceed 100%) 100 9 y current EP Toxic, TCLP, or other analysis of the material. nalysis attached Other Analysis attached No attachment material, MUST BE COMPLETED! Insport. Initiated biphenyls (PBB), Chlorinated dibenzodioxins or furans. oducts of pesticide manufacture. HA (Ref. 29 CFR 1910.1001-).
Liquid Viscosity Low Medium High Attach material safety data sheets (MSDS) for material components and an MSDS attached EP Toxic analysis attached TCLP at T	TOTAL (Typical should not exceed 100%) 100 9 y current EP Toxic, TCLP, or other analysis of the material. nalysis attached Other Analysis attached No attachment material, MUST BE COMPLETED! Insport. Initiated biphenyls (PBB), Chlorinated dibenzodioxins or furans. oducts of pesticide manufacture. HA (Ref. 29 CFR 1910.1001-). aterials, Pyrophoric compounds).
Liquid Viscosity	TOTAL (Typical should not exceed 100%) y current EP Toxic, TCLP, or other analysis of the material. nalysis attached Other Analysis attached No attachment material, MUST BE COMPLETED! Insport. Initiated biphenyls (PBB), Chlorinated dibenzodioxins or furans. oducts of pesticide manufacture. HA (Ref. 29 CFR 1910.1001-). aterials, Pyrophoric compounds). agents, Etiologic agents, USEPA Medical Waste).
Liquid Viscosity	TOTAL (Typical should not exceed 100%) y current EP Toxic, TCLP, or other analysis of the material. nalysis attached Other Analysis attached No attachment material, MUST BE COMPLETED! unsport. ninated biphenyls (PBB), Chlorinated dibenzodioxins or furans. oducts of pesticide manufacture. HA (Ref. 29 CFR 1910.1001-). aterials, Pyrophoric compounds). agents, Etiologic agents, USEPA Medical Waste). material. MUST BE COMPLETED!
E Attach material safety data sheets (MSDS) for material components and an MSDS attached EP Toxic analysis attached TCLP a F-1 Determine if any of the following prohibited substances may be in the responsibility of the following prohibited substances may be in the responsibility of the following prohibited substances may be in the responsibility of the following prohibited substances may be in the responsibility of the following prohibited substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibili	TOTAL (Typical should not exceed 100%) y current EP Toxic, TCLP, or other analysis of the material. nalysis attached Other Analysis attached No attachment material, MUST BE COMPLETED! unsport. ninated biphenyls (PBB), Chlorinated dibenzodioxins or furans. oducts of pesticide manufacture. HA (Ref. 29 CFR 1910.1001-). aterials, Pyrophoric compounds). agents, Etiologic agents, USEPA Medical Waste). naterial, MUST BE COMPLETED! Im, Lead, Mercury, Nickel, Selenium, Silver, Thallium).
E Attach material safety data sheets (MSDS) for material components and an MSDS attached EP Toxic analysis attached TCLP a F-1 Determine if any of the following prohibited substances may be in the responsibility of the following prohibited substances may be in the responsibility of the following prohibited substances may be in the responsibility of the following prohibited substances may be in the responsibility of the following prohibited substances may be in the responsibility of the following prohibited substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibility of the following restricted substances may be in the responsibili	TOTAL (Typical should not exceed 100%) y current EP Toxic, TCLP, or other analysis of the material. nalysis attached Other Analysis attached No attachment material, MUST BE COMPLETED! unsport. ninated biphenyls (PBB), Chlorinated dibenzodioxins or furans. oducts of pesticide manufacture. HA (Ref. 29 CFR 1910.1001-). aterials, Pyrophoric compounds). agents, Etiologic agents, USEPA Medical Waste). naterial, MUST BE COMPLETED! Im, Lead, Mercury, Nickel, Selenium, Silver, Thallium).
Liquid Viscosity Low Medium High E Attach material safety data sheets (MSDS) for material components and an MSDS attached EP Toxic analysis attached TCLP at TCLP at TCLP at Toxic analysis attached TCLP at	TOTAL (Typical should not exceed 100%) y current EP Toxic, TCLP, or other analysis of the material. nalysis attached Other Analysis attached No attachment material, MUST BE COMPLETED! unsport. ninated biphenyls (PBB), Chlorinated dibenzodioxins or furans. oducts of pesticide manufacture. HA (Ref. 29 CFR 1910.1001-). aterials, Pyrophoric compounds). agents, Etiologic agents, USEPA Medical Waste). naterial, MUST BE COMPLETED! Im, Lead, Mercury, Nickel, Selenium, Silver, Thallium).
Liquid Viscosity Low Medium High E Attach material safety data sheets (MSDS) for material components and an MSDS attached EP Toxic analysis attached TCLP and MSDS attached EP Toxic analysis attached Include IP Toxic analysis attached Include IP Toxic analysis attached Include IP Toxic analysis attached IP Toxic a	TOTAL (Typical should not exceed 100%) y current EP Toxic, TCLP, or other analysis of the material. nalysis attached
Liquid Viscosity Low Medium High Attach material safety data sheets (MSDS) for material components and an MSDS attached EP Toxic analysis attached TCLP at MSDS attached EP Toxic analysis attached TCLP at MSDS attached EP Toxic analysis attached TCLP at TCLP at MSDS attached EP Toxic analysis attached TCLP at TCLP at MSDS attached EP Toxic analysis attached TCLP at TCLP attached EP Toxic analysis attached TCLP at TCLP	TOTAL (Typical should not exceed 100%) y current EP Toxic, TCLP, or other analysis of the material. nalysis attached
Liquid Viscosity	TOTAL (Typical should not exceed 100%) y current EP Toxic, TCLP, or other analysis of the material. nalysis attached
E Attach material safety data sheets (MSDS) for material components and an MSDS attached EP Toxic analysis attached TCLP at MSDS attached EP Toxic analysis attached TCLP at MSDS attached EP Toxic analysis attached TCLP at MSDS attached TCLP attache	TOTAL (Typical should not exceed 100%) y current EP Toxic, TCLP, or other analysis of the material. nalysis attached
Liquid Viscosity	TOTAL (Typical should not exceed 100%) y current EP Toxic, TCLP, or other analysis of the material. nalysis attached

sk survey No. 344272

EPA Waste Description and Treatment Standards (COMP	LETE ALL QUESTIONS WITHIN ONE SECTION ONLY).
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	IS T	THIS MATERIAL A RORA "HAZARDOUS WASTET? He because, $-Y$ bux	M ONE STILL C
S E C		1. For hazardous wastes, if waste is a "listed" waste, such as "spent solvent" (F001-5), then show the applicable EPA F001 F002 F003 F004 F005 F006 K086 Other, specify	A Waste Codes:
Ť	: •		Not Applicable
O N H-1	Y E	2. For all hazardous wastes, the generator must determine if waste exhibits a characteristic of a hazardous waste, eith testing. Based on this determination, show all applicable EPA Waste Codes. □ D001 □ D002 □ D003 □ D004 □ D005 □ D006 □ D007 □ D008 □ D009 □ D010 □ D011	er based on knowledge or
	. S	3. Based on Land Disposal Restrictions, does waste have a technology-based treatment standard? (Ref. 40 CFR 268 If yes, then show all applicable technology codes: DEACT RORGS FSUBS INCIN	Not sure Yes No Other, specify
	-	4. List all applicable State Waste Codes required by generating facility state:	None required Not sure
SEC	_	1. Is this material exempt from waste regulations under RCRA (i.e., not a "solid waste")? (Ref. 40 CFR 261)	Yes (Skip to 5) No
C		2. Is this waste an "used oil" (used petroleum oil) for fuel or recovery, not disposal? (Ref. 40 CFR 279)	Yes (Skip to 5) No
i		3. Is this waste exempt from regulation as a hazardous waste? If yes, explain why in Comments.	☐ Yes (Skip to 5) ☐ No
N H-2		4. For all other "non-hazardous" wastes, submit survey with Toxicity Characteristic Leaching Procedure (TCLP) analy is not available, then contact a Safety-Kleen representative about obtaining this analysis.	
S	:	5. List all applicable State Waste Codes required by generating facility state:	None required Not sure
EC		Show SK Codes for all regulated chemicals listed in the Reference Table on the back page which can be present in n	naterial, even in trace amounts.
Ţ			□ None present
ò	NO SUF		
N H-3		Are any of these chemicals used as solvents? Li Yes Li No Are these solvents used to remove oil, gr	ease, or wax:
	[Safety-Kleen Corp. requires a representative sample and charges a fee for the prequalification of all new material. P.	
		Type of sample: Line Tank Composite of drums Sample taken by Customer	Safety-Kleen Representative
	J	Generator Certification (Not a waste handling agreement):	
		On behalf of the Generator, I hereby warrant, represent, and certify that: all information submitted in this documents of the Generator of the	
		Generator agrees to indemnify and hold Safety-Kleen Corp. and its subsidiaries harmless for any claims, lia	bilities, damages, and costs
		including, but not limited to, attorney's fees, arising out of or in any way related to breach of the above warranty b	y the Generator.
		Name Terry Bradway Title BAV. COSR	
		Signature X TE Contact Date 12-6-FY Contact Terry Brad way Title ENV. Cook	Phone (216) 827-6150
		Contact Terry Brad way Title ENV. COR	Phone (216) 123-6150
		Comments	24 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
		Sales Representative Name Time Diris Number Jour	Branch No. <u>Y-040-03</u>
	4.5	SK USE ONLY Sample leaked in transit Survey number did not match sample label Survey	ey information incomplete
		그 그는 동안 하는 이 모든 그 하나 유혹하면 화는 다른 마음은 하는 그 말이 하는 뜻했다. 그는 하는	y Logged
		Comments	
		Analysis Entered By Data Verified By	Date

81363-R4845 PARTS WASHER SERVICE FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE OF COMPLETED: 02/28/95 REVISED:

RUN: 03/01/95

ACCEPT FOR SHIPMENT

NCH/SUBMITTER: 404003 ANRON

CONTROL #: LAB #: SURVEY #:

237398-1 44747-8 512156

GENERATOR INFORMATION: CUSTOMER NUMBER: 4040-03-9889

AMERICAN STEEL FOUNDRIES 1001 E BROADWAY ALLIANCE, OH 44601

ATTN: TERRY BRADWAY

BRANCH: 404003 - AKRON

GENERAL DESCRIPTION: MINERAL SPIRITS COOLANT H20
NATURE OF BUSINESS: STEEL FOUNDRIES
FEDERAL EPA ID: OHD981090418 STATE ID(S):
FACILITY ADDRESS: MANIFEST BILLING AI
1001 E BROADWAY S.I.C.: 3325 STATUS: LOG BILLING ADDRESS: ALLIANCE, OH 44601
PROCESS DESCRIPTION: REMOVED FROM PARTS CLEANER 15 GALLONS ONE TIME ONLY DATE SURVEY SIGNED: GENERATION AMOUNT:
P.O. #:
CONTACT: TERRY BRADWAY
CORPORATE REVIEW:
DISPOSITION: ACCEPT FOR SHIP PAREVIEW DATE: 02/28/1995
APPROVED FACILITIES:
SAFETY-KLEEN CORP.
1722 COOPER CREEK ROAD
DENTON, TX 76208
FED EPA#: TXD077603371
STATE EPA#: 65124
TELEPHONE: 8173832611
STATE AUTH: GENERATION AMOUNT: PART#: 02/10/95 TITLE: ENV MGR PHN: 216-823-6150 PART NUMBER: 0082101 WASTE, SPEC. FUELS-55 REVIEWERS: MJK SAFETY-KLEEN_CORP 3700 LAGRANGE ROAD SMITHFIELD, KY 40068 KYD053348108 5028452453 STATE AUTH: APPROVED DOT - SHIPPING DESCRIPTION 0003097 DRUM OR BULK RQ W. RO WASTE COMBUSTIBLE LIQUID, N.O.S. (ALIPHATIC AND AROMATIC HYDROCARBONS) NA1993 PG III (D018)(ERG#27)

STATE/PROV. CODES: TX OU US EPA WASTE CODES: D018 TX OUTS211H D040 D039 ÛŜA

THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE HAS THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

81363-R4845 PARTS WASHER SERVICE FLUID RECOVERY SERVICES	PREQUALIFICATION	EVALUATION .	PAGE COMPLETED: REVISED: RUN:	
ACCEPT FOR SHIPMENT		CONTROL		
ANCH/SUBMITTER: 404003		LAB SURVEY	#: 23 #: 4 #: 51	7398-1 4747-8 2156
GENERAL ANALYSIS OF TOTAL COLOR WATER CONTENT: NON-VOLATILE RESIDUE: FLAMMABILITY: N FLAMMABILITY: N PH: E NEUTRALIZATION: RADIOACTIVITY: N	SAMPLE GRAY 20.3 WT% 20.3 WT% 7.9 WT% DES O FLASH AT 75 F O FLASH AT 142 F XTRACT BY METER 0.88 WT% OR ONE DETECTED		Y AS NAOH	
FUEL EVALUATION OF TOTAL HEAT CONTENT : TOTAL FLUORINE F : TOTAL BROMINE BR:	15700 BTU/LB < 0.1 WT% < 0.1 WT%			1.8 WT% 0.1 WT% 0.1 WT%
GENERAL COMPOSITION:	COMPOSITION	BY:	APPEARANC (VOL%)	E TOTAL (WT%)
AQUEOUS PHASE (FREE WAT ORGANIC PHASE (FEEDSTOC BOTTOM SLUDGE (SEMISOLI BOTTOM SOLID (SETTLED	ER) K) DS) SOLIDS)		0.0 0.0 100.0	0.0 0.0 100.0 0.0
TOTAL			100.0	100.0
TOTAL PHASE SPECIFIC	GRAVITY: .909	VISCOSITY (CENTIPO	OISE): <	500 CPS
SPECIFIC COMPOSITION OF T			SAMPLE (WT%)	TOTAL SAMPLE (WT%)
WATER CONTENT NON-VOLATILE RESIDUE VOLATILE ORGANICS BY DI	DĖŚĊ	ŔĺŔŢijŎŊŖŖŎĹijŎ	. 20.3 7.9 . 71.8	20.3 7.9 71.8
TOTAL			100.0	100.0
VOLATILE ORGANIC COMPOSIT SAMPLE PREPARATION METHO DETECTION METHODS	DDS: CS2-EXTRACT	LE BY GAS CHROMAT	OGRAPHY	
	•	COMPOSITION OF:	ORGANICS (WT%)	TOTAL SAMPLE (WI%)
MEDIUM-BOILING ALIPHATIC CODE: MHCCAS_NUMBE	HYDROCARBONS (C9- IR: 8030-30-6	·C13)	92.2	66.2
COMPOUND NAME MEDIUM-BOILING ALIPHATIC CODE: MHC CAS NUMBE HIGH-BOILING ALIPHATIC HY CODE: HHC CAS NUMBE	DROCARBONS (C14-C IR:	(20)	7.8	5.6

*** ACCEPT FOR SHIPMENT

TOTAL

CONTINUED ON NEXT PAGE

100.0

71.8

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81363-R4845 PARTS WASHER SERVICE FLUID RECOVERY SERVICES

PREQUALIFICATION EVALUATION

PAGE 3 OF 3 COMPLETED: 02/28/95 REVISED:

RUN: 03/01/95

ACCEPT FOR SHIPMENT

.NCH/SUBMITTER: 404003 AKRON

CONTROL #: LAB #: SURVEY #: 237398-1 44747-8 512156

SPECIFIC ORGANIC COMPOSITION POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

SEG CODE: REVIEWERS: MG MG LAB: PREQ NEW CASTLE ANALYZED: 02/24/95 SUBMITTED: 02/14/95 LABORATORY REVIEW: A RELEASED: 02/24/95

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED.

END OF DOCUMENT

SAFETY-KLEEN CORP PAGE OF 81363-R4845 NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE

TO: SAFETY-KLEEN CORP. 3700 LAGRANGE ROAD SMITHFIELD, KY 40068 EPA ID: KYD053348108

UNDER MANIFEST NUMBER
THE GENERATOR NOTED BELOW IS SHIPPING TO YOU A RESTRICTED WASTE UNDER FEDERAL AND STATE LAND DISPOSAL RESTRICTION REGULATIONS.
IN ACCORDANCE WITH THESE REGULATIONS, THE GENERATOR HEREBY PROVIDES NOTICE THAT THE WASTE IS RESTRICTED AND THE EPA WASTE CODES AND APPROPRIATE TREATMENT STANDARDS ARE AS FOLLOWS:

D039 DØ40 HAZARDOUS WASTE CODES: D018

TREATABILITY GROUP: NONWASTEWATERS

TREATMENT STANDARD CONCENTRATION (TOTAL MG/L, UNLESS NOTED AS "TCLF") UNIVERSAL TREATMENT STANDARDS (U.T.S) REGULATED CONSTITUENT - COMMON NAME GENERATOR IS NOT REQUIRED TO LIST UNDERLYING CONSTITUENTS BECAUSE TREATER WILL MONITOR FOR ALL 216 REGULATED CONSTITUENTS PRIOR TO LAND DISPOSAL. **

TREATMENT STANDARD

CONCENTRATION OR WASTE DESCRIPTION AND WASTE TREATMENT/REGULATORY SUBCATEGORY TECHNOLOGY CODE CODE MG/KG **** MG/KG **** BENZENE TETRACHLOROETHYLENE 10 DØ18 6.0 D039 MG/KG **** 6.0 TRICHLOROETHYLENE D040

* THESE TREATMENT STANDARDS DO NOT PRECLUDE SOLVENT RECOVERY OR USE AS FUEL PRIOR TO LAND DISPOSAL.

** NEW TREATMENT STANDARDS UNDER FEDERAL RULES EFFECTIVE 12-19-94.

*** TREATMENT STANDARDS APPLICABLE IN CERTAIN HSWA-AUTHORIZED STATES.

****AND MEET UNIVERSAL TREATMENT STANDARDS EFFECTIVE 12-19-94. NOTES: *

GENERATOR NAME: American Steel EPA ID: 040981090418 GENERATOR SIGNATURE (OPTIONAL): _____ NAME & TITLE (OPTIONAL): CONTROL NUMBER: 237398-1 SAFETY-KLEEN SAMPLE NUMBER: 512156

SAFETY-KLEEN CORP. NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE PAGE OF 1 81363-R4845

TO: SAFETY-KLEEN CORP. 3700 LAGRANGE ROAD SMITHFIELD, KY 40068

EPA ID: KYD053348108

UNDER MANIFEST NUMBER
THE GENERATOR NOTED BELOW IS SHIPPING TO YOU A RESTRICTED WASTE UNDER FEDERAL AND STATE LAND DISPOSAL RESTRICTION REGULATIONS.
IN ACCORDANCE WITH THESE REGULATIONS, THE GENERATOR HEREBY PROVIDES NOTICE THAT THE WASTE IS RESTRICTED AND THE EPA WASTE CODES AND APPROPRIATE TREATMENT STANDARDS ARE AS FOLLOWS: D039 D040 HAZARDOUS WASTE CODES: D018 TREATABILITY GROUP: NONWASTEWATERS TREATMENT STANDARD CONCENTRATION (TOTAL MG/L, UNLESS NOTED AS "TCLP") UNIVERSAL TREATMENT STANDARDS (U.T.S)
REGULATED CONSTITUENT - COMMON NAME GENERATOR IS NOT REQUIRED TO LIST UNDERLYING CONSTITUENTS BECAUSE TREATER WILL MONITOR FOR ALL 216 REGULATED CONSTITUENTS PRIOR TO LAND DISPOSAL. **

TREATMENT STANDARD CONCENTRATION OR WASTE WASTE DESCRIPTION AND TECHNOLOGY CODE TREATMENT/REGULATORY SUBCATEGORY CODE MG/KG **** MG/KG **** MG/KG **** 10 BENZENE TETRACHLOROETHYLENE D018 6.0 6.0 D039 TRICHLOROETHYLENE D040

NOTES:

THESE TREATMENT STANDARDS DO NOT PRECLUDE SOLVENT RECOVERY OR USE AS FUEL PRIOR TO LAND DISPOSAL.
NEW TREATMENT STANDARDS UNDER FEDERAL RULES EFFECTIVE 12-19-94.
TREATMENT STANDARDS APPLICABLE IN CERTAIN HSWA-AUTHORIZED STATES.

****AND MEET UNIVERSAL TREATMENT STANDA	RDS EFFECTIVE 12-19-94	1.
GENERATOR NAME: American Steel	EPA ID:	
GENERATOR SIGNATURE (OPTIONAL):	OH	098109041
NAME & TITLE (OPTIONAL):		
SAFETY-KLEEN SAMPLE NUMBER: 512156	CONTROL NUMBER:	237398-1

Salety-Hizen . MATERIAL SURVEY

SK U	SE ONL	Υ						
<u> </u>	04	<u></u>	()	2	\hat{J}	P	J*	1
	CAPTY	MI EEL			-	16 d be	***	_

SK	USE	ONLY

SK Survey No. 512156

SK LINE OF BUSINESS #	

Д	Generator Name American American						
	Nature of Business				SIC No 3	3 25	
	ID Numbers: Federal EPA 2 H 2 1 8 1 0 1 0 4 1 8 State	I					
	Status: Large Quantity Generator (LQG) Small Quantity Gen			ally Exempt Sma		erator (CESQG)	
В	Facility Street Address (No P.O. Boxes) Manifest Address		Billing Name & Addr	ess (if Different)	Ma	anifest Address	
	MALL Garden						
	City Allegar State Of zip 44/64/		City				
S 1 10		11 191111	City		State	Zíp	
С	General Description of Material Manager Specify	D	Material Composition	□ Vol % □ V	Vt % Max	Typical	
÷	Process Description Removed Arter Parels		Mineral Spin	aits		3/-	
	Generation Amount / S Gallons		Coclasit				
	Per Week Month Quarter Year One Time Only						
A.	Gallons On Hand Drums Bulk Shipping Schedule Drums Bulk	X 55	1130			- <u>40/-</u>	
111	Physical Description: Color: Lt. Parawa	30000					
	Percent Solids that Could Not be Sampled						
	Layers or Phases One Two Three						
A A	Physical State	7 1	TOTAL (Typical	should not exce	ad 100%)	100 %	
	E Attach material safety data sheets (MSDS) for material components and any current EP Toxic, TCLP, or other analysis of the material. MSDS attached EP Toxic analysis attached TCLP analysis attached Other Analysis attached No attachments						
G	DOT Hazardous Material Description		Reportable Quantity (I	Lbs): 🔲 5000 [□ 1000 □ 10	0 🗆 10 🗆 1	
	Proper Shipping Name UN/NA						
	Hazard Class Number	P	.G. Not	DOT Hazardous	Material 🖂	Not sure	
	USE ONLY Accepted for Analysis Accepted Condition	natly	Suspended for More	Information	☐ Rejected		
) د	omments	4 3 4 3		***	1	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	
_				14.4			
-		:	afety Evaluated By		Date		

3-R4845 RECOVERY SERVICE SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 1 OF 4 COMPLETED: 02/24/95 REVISED:

RUN: 02/25/95

ACCEPT FOR SHIPMENT

CONTROL #:

237410-6

BRANCH/SUBMITTER: 404003 AKRON

LAB #: SURVEY #:

44759-4 512155

GENERATOR INFORMATION: CUSTOMER NUMBER: 4040-03-9884 9889

AMERICAN STEEL FOUNDRIES 1001 E BROADWAY ST ALLIANCE, OH 44601

ATTN: TERRY BRADWAY

BRANCH: 404003 - AKRON

GENERAL DESCRIPTION: WASTE OIL
NATURE OF BUSINESS: STEEL FOUNDRY
FEDERAL EPA ID: OHD981090418 STATE ID(S
FACILITY ADDRESS: MANIFEST BILLI
1001 E BROADWAY ST
ALLIANCE, OH 44601
PROCESS DESCRIPTION: DRAIN EQUIPMENT
GENERALION AMOUNT: 110 GALLONS MONTHLY S.I.C.: 3325 STATUS: SQG STATE ID(S):
BILLING ADDRESS: LLONS MONTHLY PART#:
DATE SURVEY SIGNED: 02/10/95
TITLE: ENVIRONMENTAL MGR PHN: 216-823-6150 P.O. #: CONTACT: TERRY BRADWAY SURVEY COMMENTS: CHECK FOR SKOS

363-R4845 RECOVERY SERVICE OIL SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 2 OF COMPLETED: 02/24/95 REVISED:

RUN: 02/25/95

ACCEPT FOR SHIPMENT

CONTROL #:

237410-6

BRANCH/SUBMITTER: 404003 AKRON

LAB SURVEY #: 44759-4 512155

CORPORATE REVIEW:
DISPOSITION: ACCEPT FOR SHIP
REVIEW DATE: 02/24/1995

PART NUMBER: 0082107 WASTE, OIL FUEL REVIEWERS: MJK

-55

APPROVED FACILITIES:
BRESLUBE
601 RILEY RD
EAST CHICAGO, IN
FED EPA#: IND07704234

219-397-1131

SAFETY-KLEEN CORP. 633 E 138TH ST DOLTON, IL 60419 ILD980613913

FED EPA#: STATE EPA#:

0310690006

TELEPHONE:

7088494850

STATE AUTH:

000164

SAFETY-KLEEN_CORP. 3700 LAGRANGE ROAD SMITHFIELD, KY 40068 KYD053348108

FED EPA#: STATE EPA#: TELEPHONE:

5028452453

STATE AUTH:
APPROVED DOT - SHIPPING DESCRIPTION

DRUM OR BULK 0001073

WASTE OIL

(NOT USDOT HAZARDOUS MATERIAL)

US EPA WASTE CODES: NONE USA

REVIEW COMMENTS:

OK FOR SKOS USED OIL.

OK FOR WASTE OIL FUEL.

PROPER SHIPPING DESCRIPTION WAS BASED ON THIS SINGLE ANALYSIS. GENUST CERTIFY THAT SHIPMENT IS NOT HAZARDOUS. PER COMPANY POLICY, CUSTOMERS MUST COMPLETE GENERATOR CERTIFICATION WITH EACH SHIPMENT AND BRANCH WILL FILE IN CUSTOMER RECORDS. GENERATOR

THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE HAS THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO ACCEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

CONTINUED ON NEXT PAGE

ACCEPT FOR SHIPMENT

P1363-R4845 RECOVERY SERVICE CLL SERVICES FUEL	PREQUALIFICATION		PAGE COMPLETED: REVISED:	
ACCEPT FOR SHIPMENT		· CONTRO	L #: 23	7410-6
BRANCH/SUBMITTER: 404003 AKRON		· CONTRO LA SURVE	B #: 4 Y #: 51	4759-4 2155
GENERAL ANALYSIS OF TOTAL COLOR : WATER CONTENT : NON-VOLATILE RESIDUE: FLAMMABILITY : N FLAMMABILITY : N PH : E RADIOACTIVITY : N COMMENTS: NVR AT 200C =	SAMPLE DK BROWN < 0.1 WT% 98.8 WT% DES O FLASH AT 75 F O FLASH AT 142 F XTRACT BY METER ONE DETECTED	CRIPTION: OIL BY SETAFLASH BY SETAFLASH 7.1		
FUEL EVALUATION OF TOTAL HEAT CONTENT : TOTAL FLUORINE F : TOTAL BROMINE BR: COMMENTS: NO FLASH ON S	18900 BTU/LB < 0.1 WT% < 0.1 WT% ETA AT 202/TOTAL	HABIDEO - 1224III		
GENERAL COMPOSITION:	COMPOSITION	BY:	APPEARANC (VOL%)	CE TOTAL (WT%)
AQUEOUS PHASE (FREE WAT ORGANIC PHASE (FEEDSTOC BOTTOM SLUDGE (SEMISOLI	ER) K) DS) SOLIDS)		100.0	0.0 100 0
TOTAL			100.0	100.0
TOTAL PHASE SPECIFIC	GRAVITY: .900	VISCOSITY (CENTI	POISE): <	50 CPS
VOLATILE ORGANIC COMPOSIT SAMPLE PREPARATION METHOD DETECTION METHODS	DDS: HEXANE-EXTRAC : ECD, FID, FID	T, CS2-EXTRACT		
COMPOUND NAME PERCHLOROETHYLENE	, ,	COMPOSITION OF: (D039)	ORGANICS	
CODE: PERC CAS NUMBE TRICHLOROETHYLENE	ER: 127-18-4	(D039) (D040)		
CODE: TCE CAS NUMBE TRICHLOROETHANE, 1,1,1- ((ODS)	. (====,	1.7	
CODE: 111 CAS NUMBE	R: 71-55-6		77.4	
SPECIFIC ORGANIC COMPOSIT	ION		//.4	
POLYCHLORINATED BIPHENY	LS (PCBS): NONE D			
ADDTNL ANALYTICAL INFO: S	A Company	A second	**************************************	
LABORATORY REVIEW: A SI RELEASED: 02/23/95 AN	EG CODE: REVI NALYZED: 02/23/95	EWERS: TLM TLM SUBMITTED: 02/	LAB: PREQ N 14/95	EM CUSITE

*** ACCEPT FOR SHIPMENT

CONTINUED ON NEXT PAGE

363-R4845 RECOVERY SERVICE SERVICES FUEL

PREQUALIFICATION EVALUATION

PAGE 4 OF 4 COMPLETED: 02/24/95 REVISED: 02/25/05

RUN: 02/25/95

ACCEPT FOR SHIPMENT

CONTROL #:

237410-6 44759-4 512155

BRANCH/SUBMITTER: 404003 AKRON

LAB #: SURVEY #:

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS NOT REQUIRED.

ACCEPT FOR SHIPMENT

END OF DOCUMENT



safety-kieen . MATERIAL SURVEY

512155

SK USE ONLY

SK Survey No.

Control No.	
Lab No	

A Generator Name AMCRITION STATE TO STATE	
Nature of Business	s.i.c. No. 3 3 2 5
ID Numbers: Federal EPA 으 ほ ひ う ら 1 0 9 0 4 1 8 State	ID State ID
Status: > Large Quantity Generator (LQG) Small Quantity G	
B Facility Street Address (No P.O. Boxes)	Billing Name & Address (If Different)
Man a Bunday St	
City 14 / / State Zip 1/6/1/	City State Zip
C General Description of Material Advisor College	D Material Composition Vol % Wt % Max Typical
Process Description 1 RAS Library Milat	Wash Gil.
Generation Amount // Gallons Per Week Month Quarter Year One Time Only	
Gallons On Hand Drums Bulk	
Shipping Schedule 12 wk Drums Bulk Physical Description: Color: 13 lack Backwa	
Percent Solids that Could Not be Sampled pH Range	
Layers or Phases One Two Three	
Physical State Liquid Paste Solid Liquid Viscosity Low Medium High	TOTAL (Typical should not exceed 100%) 100 %
E Attach material safety data sheets (MSDS) for material components and MSDS attached EP Toxic analysis attached TCLI	any current EP Toxic, TCLP, or other analysis of the material. P analysis attached
F 4	
F-1 Determine if any of the following prohibited substances may be in the Yes No DOT Radioactives, Explosives, or materials forbidden from	te material. MUST BE COMPLETED!
Yes X No TSCA regulated materials, Chlorinated biphenyls (PCB), Br	ominated biphenyls (PBB), Chlorinated dibenzadioxins or furans
Yes No Products used as pesticides, herbicides, insecticides or by Human carcinogens above exclusion levels as defined by	products of pesticide manufacture.
Yes No Reactive components (Sulfides, Cyanides, Shock sensitive	materials, Pyrophoric compounds).
Yes No Biological hazards (such as Pathogenic materials, Infection	
F-2 Determine if any of the following restricted substances may be in the	and the control of th
Yes No Toxic metals (Arsenic, Barium, Beryllium, Cadmium, Chron Yes No Water or amine-reactive components (such as unreacted Is	nium, Lead, Mercury, Nickel, Selenium, Silver, Thallium).
F-3 If yes, then identify substances and concentration	obyanate monorners and resins, Acid chlorides, Annydrides, Epoxides).
G DOT Hazardous Material Description Proper Shipping Name	☐ Reportable Quantity (Lbs): ☐ 5000 ☐ 1000 ☐ 100 ☐ 10 ☐ 1
Hazard Class UN/NA Number	P.G. Not DOT Hazardous Material Not sure
USE ONLY Accepted for Analysis Accepted Condition	
USE ONLY	onally Suspended for More Information Rejected



American Steel Foundries

1001 EAST BROADWAY * P.O. BOX 2060 * ALLIANCE, OHIO 14460

(216) 823 -6150 * FAX NO. (216) 821-4568

January 09, 1995



OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

CERTIFIED LETTER
RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, HRE-8J U.S. EPA, Region V 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Barbara Mazur

Z 055 522 224

Z 055 522 223

Chief, SWERB Section V Office of Regional Counsel U.S. EPA Region V, 5CS-TUB3 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Richard Clarizio

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

Progress Report # 11

This submittal is intended to meet the progress report requirements of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report:

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R.# 265.118 (d) (4) and (f) and Ohio Admin. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

Closure of the Electric Arc Furnace Baghouse Waste Management Unit was undertaken during our plant vacation shutdown in the first two weeks of August 1994. Excavation was performed to the base of the foundations in the entire unit in order to attempt clean closure. A concrete slab was poured over the back filled excavation during the third week of August and a documentation of closure was prepared for submittal in early October.

In his October 12, 1994 letter, Mr. J. F. Oesch, Plant Manager, American Steel Foundries submitted an EAF Closure Activity Report to the Ohio EPA and the U.S. EPA.

In accordance with Mr. John Palmer's instructions to Ms. Bernadette Wellman at ASF, a Closure Certification Report is being prepared in accordance with Ohio Administrative Code and the most recent RCRA Closure Guidance Document in addition to the EAF Closure Activity Report submitted on October 12, 1994. The document will be submitted in January 1995.

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4).

In a June 01, 1994 letter to Mr. Donald R. Schregardus, Director Ohio EPA, American Steel Foundries requested a meeting with the agency to discuss beneficial reuse of foundry wastes and possible modifications to the landfill cap design.

On July 25, 1994 a meeting was held between Ohio EPA and American Steel Foundries at the Ohio EPA Northeast District Office in Twinsburg, Ohio to discuss Sebring Landfill Closure Plan issues and waste reduction. As a direct result of that meeting the cap outlined in the closure plan document is being redesigned and a modified closure plan is being prepared.

In an August 05, 1994 letter to Mr. Donald R. Schregardus, Director Ohio EPA, American Steel Foundries withdrew the Landfill Closure Plan dated January 1993 and stated that a revised plan would be submitted no later than December 15, 1994. The revised plan will include issues critical to the Ohio EPA and American Steel Foundries as outlined in the August 05, 1994 letter and discussed in the July 25, 1994 meeting.

In an October 04, 1994 letter to Mr. John Palmer, Ohio EPA, Ms. Bernadette Wellman from American Steel Foundries submitted a list of questions for Ohio EPA review relative to the redesigned landfill cap. Response and/or clarification was requested so that American Steel Foundries could finalize the new Sebring Landfill Closure plan.

Mr. John Palmer, Ohio EPA responded to Ms. Wellman's October 04, 1994 clarification requests with his letters dated October 24, 1994, November 01, 1994 and November 09, 1994.

On November 11, 1994, Mr. John Wories, American Steel Foundries submitted a progress report to Mr. Ed Kitchen, Environmental Manager, Ohio EPA. Topics of discussion included a projected submittal date of December 15, 1994 for the new Sebring Landfill Closure Plan.

In a December 09, 1994 letter, Mr. John Oesch, Plant Manager, American Steel Foundries formally submitted the new Sebring Landfill Closure Plan.

Mr. Edward J. Brosius, Assistant General Counsel & Assistant Secretary, Amsted Industries Inc. demonstrated Financial Assurance to the EPA in letter dated December 20, 1994.

Mr. John Oesch, Plant Manager, American Steel Foundries formally submitted the new Sebring Landfill Closure Plan Closure Cost Estimate in a December 16, 1994 letter.

On December 19, 1994, Mr. John Oesch, Plant Manager, American Steel Foundries formally submitted the Surcharge and Settlement Monitoring Plan for the new Sebring Landfill.

In a "NOTIFICATION OF ERROR" letter dated December 21, 1994, Mr. T. C. Bradway, Environmental Manager, American Steel Foundries informed the Ohio EPA and the U. S. EPA that the possibility existed that the wrong cover letter had been sent with the Surcharge and Settlement Monitoring Plan for the new Sebring Landfill.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

- 1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."
- 3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.
- 4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.
- 5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.
- 6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In a June 28, 1994 letter to Mr. Terry Bradway of American Steel Foundries, Mr. John Palmer from Ohio EPA listed his notice of deficiencies for the February 23, 1994 Groundwater Sampling Report of the December 14 through 17, 1993 sampling of the groundwater monitoring wells at the Sebring Landfill.

In a July 22, 1994 letter subtitled "Groundwater Sampling Report Response to Comments" American Steel Foundries responded to Mr. John Palmer's June 28, 1994 notice of deficiencies letter.

Ms. Bernadette Wellman Manager of Environmental Affairs, American Steel Foundries received a response to the July 22, 1994 letter subtitled "Groundwater Sampling Report Response to Comments" covering the notice of deficiency to the February 23, 1994 Groundwater sampling event by Mr. John Palmer from the Ohio EPA in a November 23, 1994 letter.

In a July 15, 1994 letter from Mr. John Palmer of the Ohio EPA to Mr. Terry Bradway at American Steel Foundries, John listed a notice of deficiencies for the Supplementary Annual Report for the 1993 Ground Water Monitoring of the Sebring Landfill.

In a July 22, 1994 letter subtitled "Response to Groundwater Comments", American Steel Foundries addressed Mr. Palmer's notice of Deficiencies from the July 15, 1994 letter.

Ms. Bernadette Wellman Manager of Environmental Affairs, American Steel Foundries received a response to the July 22, 1994 letter subtitled "Response to Groundwater Comments" for the notice of deficiency to the "1993 Supplementary Annual Report" by Mr. John Palmer from the Ohio EPA in a November 23, 1994 letter.

In a December 05, 1994 Letter subtitled "Sampling Report No. 4" from Mr. John Oesch, Plant Manager, American Steel Foundries submitted the sampling report for the September 14 and 15, 1994 sampling of the groundwater monitoring wells at the Sebring Landfill.

In a December 19, 1994 letter titled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's November 23, 1994 letter covering the "1993 Supplementary Annual Report" notice of deficiencies.

In a December 21, 1994 letter titled "Groundwater Sampling Report Response to Comments", Mr. John F. Oesch, Plant Manager, American Steel Foundries responded to Mr. John Palmer's November 23, 1994 letter covering the June 28, 1994 notice of deficiencies from Mr. John Palmer, Ohio EPA.

A copy of the Groundwater Quality Assessment for the Sebring Facility was included as an appendix of the New Landfill Closure Plan that was submitted by Mr. John F. Oesch's letter of December 09, 1994. Currently the document is being revised to reflect changes requested in both of Mr. John Palmer's letters of November 23, 1994. The revised document was submitted in a January 06, 1995 letter by Mr. John F. Oesch, Plant Manager, American Steel Foundries.

The next sampling event is tentatively scheduled for the week of March 13, 1995.

TEST RESULTS AND SAMPLING SUMMARY

Our experiments to reduce lead and cadmium in Electric Arc Furnace dust have concluded. Although American Steel Foundries has been successful in reducing the levels of toxicity in the dust, we have not been successful in keeping them consistently below TCLP regulatory action levels for hazardous materials. However, we plan to monitor each load of dust with the EPA Toxic Characteristic Leaching Procedure (TCLP) test for metals for an indefinite period.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

In December 1994 the following waste streams were sampled:

- 1. Spent Foundry Sand
- 2. Floor Sweepings
- 3. Refractory Brick
- 4. Broken Core Butts

Test results from that sampling have not been received to date but will be included in the next quarterly report.

A waste stream profile was established for material from a spill of Terrapaint Core Wash. Please see attachment "B".

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

truly,

PLANT MANAGER

Yours

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW

JW RML RBR

Ohio EPA
Chief, Division of Solid and Hazardous Waste
1800 WaterMark Drive

P.O. Box 1049 Columbus, Ohio 43268-0149

Ohio EPA
Division of Solid and Hazardous Waste
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Ohio EPA Z 055 522 227
Supervisor, division of Solid and Infectious Waste Management
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Z 055 522 228

Edward J Brosius, ESQ. Amsted Industries, Inc. 44th Floor - Boulevard Towers South 205 N. Michigan Ave. Chicago, Illinois 60601

P. C. Schillawski Squire Sanders & Dempsey 4900 Society Center 127 Public Square Cleveland, Ohio 44114-1304

Mahoning County Health District Z 055 522 229
Chief, Solid Waste Program
2801 Market Street
Youngstown, Ohio 44507-1649
Attn: R.D.Setty

C:\WP51\HAZWASTE\USVAMSTD.TB4

ATTACHMENT "A"

RESAMPLE SAMPLE **ANALYSIS REQUEST FORM**



Camaratar Nama	AMERI	CAN STEEL	FOUNDRIE:	S	
Generator Name: Facility Address:	1001	E. BROADWA	AY ST.	And the second of the second o	
	ALLIA	NCE	OHIO		44601
Stream Number:	CS137	ity 3		state Date Results Ne	ZIP eded: TO 10 DAYS
Waste Code: Volume:	D006,	D008			EACH BOX
Generator's Description		cation of Waste			
	D006,	D008			
		AT			
Comments:					
	TCLP	METALS ON	I.Y	Harden Atta Barran Andrew Control of the Control of	
	SAMPI	E NO. 122	-894 A	BOX NO.	116
Request Submitted by:	T.C.E	RADWAY		Date Submitted:	12/23/94
CERTIFICATION:					
this document is repre	esentati npler and	ve. In the eve d witness in th	ent that I pers	sonally collected	nd the sample accompanying the sample, I have identified ollected the sample, both the
Date of Sampling:	_	12/28/94	4400 Atop ()	Time of Samplin	g: Composite AM/PN
Sampler's Name:	_	T.C.	BRADWAY		,
Title and Affiliation of Sa	ampler:	ENVIRONME	NTAL MANAC	GER, AMERICAN	STEEL FOUNDRIES
Sampler's Signature:		120	me		
Witness's Name:	_	(Y our	Con	7	
Title and Affiliation of W	itness:	<i>U'</i>			
Witness's Signature:					
ENVCHCDY.EAF					

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



12/22/94 11:08

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street

Alliance, Ohio 44601

Report Date: 12/22/94 Envirite Waste ID#: CS1373 Sample Collection Date: 12/16/94 Date Analysis Completed: 12/20/94

Waste Description: EAF Furnace Dust

142 BOX #:

Parameter	Results
pH (TCLP)	6.4
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.5 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	<0.16 mg/L
TCLP Mercury	0.0042 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.010 mg/L
TCLP Silver	0.40 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

CC: File TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS
TO: TERRY BRADWA	lΥ	ENVIRITE CORPORATION
CO: AMERICAN STEE	EL FOUND.	Phone: 216-456-6238
FAX#: 216-821-456	3	FAX#: 216-456-2801

RECEIVED DEC 16 1994 6 10:42

RESAMPLE SAMPLE **ANALYSIS** REQUEST **FORM**

CORPORATIO

	AMERICAN STEEL FO	DUNDRIES	3	
Generator Name: Facility Address:	1001 E. BROADWAY	ST.		
	ALLIANCE	OHIO		44601
Stream Number:	CS1373		State Date Results Nee	7 TO 10 DAYS
Waste Code:	D006, D008		Frequency:	
Volume:				
Generator's Description	/ Identification of Waste: EAF FURNACE DUST			
	D006, D008			
and the state of t				
Comments:				
· · · · · · · · · · · · · · · · · · ·	TCLP METALS ONLY			
	SAMPLE NO.		BOX NO.	142.
Request Submitted by:	T.C.BRADWAY		Date Submitted:	12/16/94
CERTIFICATION:				
this document is repr myself as both the sar	esentative. In the event I	that I pers paces belo	onally collected th	the sample accompanying is sample, I have identified ilected the sample, both the
Date of Sampling:	12/16/94		Time of Sampling:	COMPOSITE AMIPM
Sampler's Name:	T.C.BRA	ADWAY	NAMES OF THE PARTY	
Title and Affiliation of S	ampler <u>ENVIRONMENT</u>	LL MANAG	ER, AMERICAN	STREL FOUNDRIES
Sampler's Signature:	X Trook	1		

ENVCHCDY . EAF

Witness's Signature:

Title and Affiliation of Witness:

Witness's Name:

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

RECEIVED

P. Cook



RESAMPLE SAMPLE ANALYSIS REQUEST FORM



Generator Name:	AMERICAN STEEL FO	DONDRIES		
Facility Address:	1001 E. BROADWAY	ST.		
,	ALLIANCE	OHIO		44601
Stream Number:	CS1373		State Date Results Nee	ded: TO 10 DAYS
Waste Code:	D006, D008		Frequency:	
Volume:				***************************************
Generator's Description	/ Identification of Waste: EAF FURNACE DUST			
	D006, D008			
Comments:	TCLP METALS ONLY			
	SAMPLE NO.		BOX NO.	142
Request Submitted by:	T.C.BRADWAY		Date Submitted:	12/16/94
CERTIFICATION:				
this document is repr myself as both the sar	esentative. In the event	that I pers	onally collected the	d the sample accompanying ne sample, I have identified llected the sample, both the
Date of Sampling:	12/11/94		Time of Sampling	: Composite AM/PM
Sampler's Name:	T.C.BR	ADWAY		
Title and Affiliation of S	ampler: <u>ENVIRONMENT</u>	'AL MANAC	ER, AMERICAN	STEEL FOUNDRIES
Sampler's Signature:				
Witness's Name:	$\mathcal{A}b$			
Title and Affiliation of V	Vitness: RECEIVED B	9 P.Co	OK 12-16-94	Gent low
Witness's Signature:				
ENVCHCDY.EAF				

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



12/08/94 15:29

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street

Alliance, Ohio 44601

Report Date: 12/08/94 Envirite Waste ID#: CS1373 Sample Collection Date: 11/28/94 Date Analysis Completed: 12/06/94

Waste Description: EAF Furnace Dust

120 BOX #:

Parameter	<u>Results</u>
рН (ТСLР)	6.7 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.1 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	1.7 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use. mn daw Kens

Analysis Approved by:

CC: TSR:

.File

FAX	#Pages - 1	From: CHERYL HAWKINS	
TO: TERRY BRADWAY		ENVIRITE CORPORATION	
CO: AMERICAN STEEEL FOUND.		Phone: 216-456-6238	
FAX#: 216-821-4568		FAX#: 216-456-2801	

RESAMPLE SAMPLE ANALYSIS REQUEST FORM



AMERICAN STEEL FOUNDRIES Generator Name: 1001 E. BROADWAY ST. Facility Address: ALLIANCE OHIO 44601 City CS1373 TO 10 DAYS Date Results Needed: Stream Number: D006, D008 Waste Code: Frequency: EACH BOX Volume: Generator's Description / Identification of Waste: EAF FURNACE DUST D006, D008 Comments: TCLP METALS ONLY SAMPLE NO. 112894 A BOX NO. Request Submitted by: T.C.BRADWAY Date Submitted: CERTIFICATION: I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below. Date of Sampling: Time of Sampling: < T.C.BRADWAY Sampler's Name: Title and Affiliation of Sampler: MANAGER, AMERICAN STEEL FOUNDRIES Sampler's Signature: Witness's Name: Title and Affiliation of Witness: Witness's Signature: ENVCHCDY.EAF

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.





ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 11/18/94 Envirite Waste ID#: CS1373 Sample Collection Date: 11/09/94 Date Analysis Completed: 11/17/94

Waste Description: EAF Furnace Dust

BOX #: 149

Parameter	Results
рН (тсцэ)	6.76
Total CN (As Received)	1.1 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	0.64 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	2.1 mg/L
TCLP Mercury	0.0037 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.014 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Coordinator

cc: File TSR: tmc

FAX 11-18-94	#Pages - 1	From: CHERYL HAWKINS	
TO: TERRY BRADWAY		ENVIRITE CORPORATION	
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238	
FAX#: 216-821-4568		FAX#: 216-456-2801	

RESAMPLE



SAMPLE		
ANALYSIS		
REQUEST		
FORM		

Generator Name:	AMERI	CAN STE	T FOUNDR	TE2		
Facility Address:	1001	E. BROAI	DWAY ST.			
•	ALLIA	NCE	OHI	0		44601
Stream Number:	CS137	City 13		State Date Results	Needed: ⁷ TO 1	0 DAYS
Waste Code:	D006,	D008		Frequency:	EACH	вох
Volume:						
Generator's Description		cation of Wa				
	D006	, D008				
Comments:						
	TCLP	METALS	ONLY		- NASSELVI	
	SAMP	LE NO. \	D994 A	BOX N	0. 149	
Request Submitted by:	T.C.1	BRADWAY		Date Submit	ited: 1114191	<u>†</u>
CERTIFICATION:						
I certify that I have de this document is rep myself as both the sa sampler and witness	resentati mpler ar	ive. In the Id witness i	event that I the spaces	personally collect	ted the sample, I	have identified
Date of Sampling:		11/9/94		Time of San	npling: (a mpos)	AM/PM
Sampler's Name:		Т.	C.BRADWAY	Y		
Title and Affiliation of S	Sampler:	ENVIRON	MENTAL MA	NAGER, AMERI	CAN STEEL FOU	INDRIES
Sampler's Signature:		T,C ?	Con E	mon		
Witness's Name:						
Title and Affiliation of V	Vitness:	RECTO	11-9-9	4 fort g	& Court	
Witness's Signature:		_XB.	rky	<i>V</i> ,		
ENVCHCDY.EAF			\bigcirc			

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 11/01/94 Envirite Waste ID#: CS1373 Sample Collection Date: 10/20/94 Date Analysis Completed: 10/26/94

Waste Description: EAF Furnace Dust

BQX #: 150

<u>Parameter</u>	Results
pH (TCLP)	6.67
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barlum	<1.6 mg/L
TCLP Cadmium	1.8 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	3.2 mg/L
TCLP Mercury	0.0068 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This enalysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Errykite facilities. Envirte makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

QA/RC Goordina

CC: File

EMC			
FAX	#Pages - 1	From: CHERYL HAWKINS	
TO: TERRY BRADWAY		ENVIRITE CORPORATION	
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238	
FAX#: 210-821-4568		FAX#: 216 456-2801	

RESAMPLE SAMPLE ANALYSIS REQUEST FORM



AMERICAN STEEL FOUNDRIES Generator Name: 1001 E. BROADWAY ST. Facility Address: ALLIANCE OHIO 44601 City State CS1373 TO 10 DAYS Date Results Needed: Stream Number: D006, D008 EACH BOX Waste Code: Frequency: Volume: Generator's Description / Identification of Waste: EAF FURNACE DUST D006, D008 Comments: TCLP METALS ONLY Request Submitted by: T.C.BRADWAY Date Submitted: CERTIFICATION: I certify that I have designated the location point(s) for sample collection and the sample accompanying this document is representative. In the event that I personally collected the sample, I have identified myself as both the sampler and witness in the spaces below. If I have not collected the sample, both the sampler and witness are correctly identified below. Time of Sampling: Composite Date of Sampling: T.C.BRADWAY Sampler's Name: Title and Affiliation of Sampler: ENVIRONMENTAL MANAGER AMERICAN STEET Sampler's Signature: Witness's Name: Title and Affiliation of Witness: Witness's Signature:

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVCHCDY.EAF

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 10/18/94 Envirite Waste ID#: CS1373 Sample Collection Date: 10/04/94 Date Analysis Completed: 10/11/94

Waste Description: EAF Furnace Dust

BOX #: 10/4/94

Parameter	Results
pH (TCLP)	6.35 S.U.
Total CN (As Received)	1.6 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	3.9 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	26.0 mg/L
TCLP Mercury	0.0037 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.031 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and axclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

QA/RE/Coordinato

cc: File

FAX	#Pages - 1	From: CHERYL HAWKINS	
TO: TERRY BRADWAY		ENVIRITE CORPORATION	
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238	
FAX#: 216-821-4568		FAX#: 216-456-2801	

RESAMPLE SAMPLE ANALYSIS REQUEST FORM

CORPORATION

Congretor Name:	AMERICAN STEEL FOUNDRI	ES	
Generator Name: Facility Address:	1001 E. BROADWAY ST.		
	ALLIANCE OHIO		44601
Stream Number:	CS1373	State Date Results Ne	zæ. eded: _TO 10 DAYS
Waste Code:	D006, D008	Frequency:	EACH BOX
Volume:			
Generator's Description	on / Identification of Waste: EAF FURNACE DUST		
	D006, D008		
Comments:			
	TCLP METALS ONLY		
	SAMPLE NO. 100494 A	BOX NO.	101
			,
Request Submitted by	T.C.BRADWAY	Date Submitted:	10 H OH
CERTIFICATION:			
this document is rep myself as both the sa	esignated the location point(s) for soresentative. In the event that I per ampler and witness in the spaces be are correctly identified below.	rsonally collected t	the sample. I have identified
Date of Sampling:	10/4/94	Time of Sampling	J: <u>Composite</u> AM/PM
Sampler's Name:	T.C.BRADWAY		
Title and Affiliation of	Sampler: <u>ENVIRONMENTAL MANA</u>	GER, AMERICAN	STEEL FOUNDRIES
Sampler's Signature:	me 25t		
Witness's Name:			
Title and Affiliation of	Witness: RECD 10-4-94	f	
Witness's Signature:	Ter als	/ lls	
ENVCHCDY.EAF			

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 09/22/94 Envirite Waste ID#: CS1373

Sample Collection Date: 09/15/94 Date Analysis Completed: 09/20/94

Waste Description: EAF Furnace Dust

BOX #: 110

Parameter	Results
рН (тсц»)	6.25 S.U.
Total CN (As Received)	0.56 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.8 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	31.0 mg/L
TCLP Mercury	0.0058 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.013 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirte facilities. Envirte makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

CC: File TSR: Imc

FAX	#Pages - 1	From: CHERYL HAWKINS	
TO: TERRY BRADWAY		ENVIRITE CORPORATION	
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238	
FAX#; 216-821-4568		FAX#: 215-456-2801	



<u>Waste approval form</u>

Date

: 10/18/94

BFI Location

: Willow Creek Landfill

BFI Initiator

: CASANTA, A

Generator

: AMERICAN STEEL FOUNDRIES

Generator Location : Alliance, OH

WCD Number

: AB39062

BFI Number

: 225032

WASTE DESCRIPTION:

Soil

Specific Products, Flowcoat

Approved 10 1991

SAFETY PRECAUTIONS: Avoid 8kin and Eye Contact.

RECOMMENDED MANAGEMENT: Direct Buris!

Facility...

Glan Willow Landfill Northern Ohio Landfills Willow Creek Lendfill Mehoning Landfills

COMMENTS:

Approved for one-time only disposel.

The following items were received by the Corporate Waste Approval Group;

- a. Analytical data from DeYor MetPath Laboratories
- b. Chain of Custody
- c. Meterial Salety Data Sheets

The above is a recommendation of BPI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal of the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposel facility of a waste material casentially aquivalent in chemical composition and physical properties to that we defined above,

This weste stroam has been assigned BFI Waste Code: <u>OH/217:218:219:855/951018/226032</u>

Corporate Wagte Approval Group

Technical Representative



OH 217, 218, 217, 95/018 205032.
BFI WASTE CODE \$55

BFI to complete this area.	
BFI Initiator: Al CasanTa	Action Requested: New Waste Approval
Location: h/llowcreek/ Muss	Up-Date Approval - Previous Number:
Company Number: 2/9 / 6//	Disposal Site Requested: 217.218.219.85.5
Telephone: (2/6) 947-2548	Company Number:
Fax: (2/6) 947-2724	Management Method Requested: ALandfill AHauling
Date: 9-2-94	☐ Other
WASTE CHARAC SPECIA	CTERIZATION DATA AL WASTE
IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTAT INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS T LEGIBLY PRINTED IN INK, AND SIGNED.	TIVE OF THE WASTE GENERATOR. PLEASE READ THE TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR
1. GENERAT	OR INFORMATION
a) Generator's Name: AMERICA- STREL FOUNDAIRS	e) State/Provincial/Local Registration No.:
b) Generating Facility's Address: 1001 E, Bashoway	Generator's EPA Id. No.: OHDA81090418
City: ALLIANCE State: OH Zip: 44661	Industry Description/SIC Code: 3325
c) Generator's Répresentative: TERRY C BRROWAY	• •
Title: Environmental Manager	f) Customer's Name:
Telephone: (216) 823 - 6150 FxT. 206	g) Customer's Mailing Address:
Fax: (21L) 821 - 4568	City:State:Zip:
d) Emergency/Information Contact: Same As Asove	h) Representative:
Title:	Telephone: ()
Telephone: ()	Fax: ()
, , , , , , , , , , , , , , , , , , , ,	(APROVED FOUNDEN SAMO)
a) Name/Description of The Waste: Flow Cont 22 n. T b) Process Generating Waste: Clean of Spill a	TESTREAM INFORMATION OH/855/950212/202142) TERRAPAINT #578 SOIL, PREVIOUS APPROVED P OF STORAGE DOCK IN NORTH END OF NEW
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted lf yes, describe the waste and the process generating the waste prior to list this a "Hazardous Waste" as defined by State, Provincial, or local Reference.	TERRAL DOCK IN NO PREVIOUS APPROVED TO THE STORAGE DOCK IN NO PETH SAID OF NEW OF THE STORAGE OF THE SENDER THE STORAGE DOCK IN NO PROTECTION OF THE SENDER THE SENDE
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted lifyes, describe the waste and the process generating the waste prior to lis this a "Hazardous Waste" as defined by State, Provincial, or local Reflection of the Waste Identification Number if one has been assigned list this a "Special Waste", an "Industrial Process Waste", or a "Pollution"	TERRAL DOCK NO. 17 # 578 SOIL PREVIOUS APPROVED FOR STORAGE DOCK NO. 10 DE NO. 10 TERRAL DOCK NO. 10 TERRA D
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to Is this a "Hazardous Waste" as defined by State, Provincial, or local Reflection of It yes, enter the Waste Identification Number if one has been assigned e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes No If yes, enter Waste Identification Number:	TERRAL DOCK IN NO REVIEW APPROVED TO THE STAROUS WASTE? YES NO RESTRICTION OF THE SEND OF
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to Is this a "Hazardous Waste" as defined by State, Provincial, or local Reference If yes, enter the Waste Identification Number if one has been assigned to Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes In No If yes, enter Waste Identification Number: i) Recommended personal protection equipment and special handling process.	CRRON T #578 SOIL PREVIOUS REPROVED RESIDENCE TO NO REPROVED RESIDENCE TO NO REPROVED RESIDENCE TO THE SOURCE TO T
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to Is this a "Hazardous Waste" as defined by State, Provincial, or local Relif yes, enter the Waste Identification Number if one has been assigned e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes In No If yes, enter Waste Identification Number: i) Recommended personal protection equipment and special handling programment of the process of the process of the process waste of the process of the process waste of the	A CARA DRILL T # 578 SOIL REVIEW APPAULO RE STORAGE DOCK IN NO OF HOW IN THE WOOD REVIEW BY STORAGE DOCK IN NO OF HOW IN THE WOOD REVIEW BY STORAGE DOCK IN NO OF HOW IN THE WOOD REVIEW BY STORAGE DOCK IN THE WOOD REVIEW BY STO
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to Is this a "Hazardous Waste" as defined by State, Provincial, or local Reflexible If yes, enter the Waste Identification Number if one has been assigned e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Is this a "Special Process Waste", or a "Pollution Is this a "Special Process Waste", or a "Pollution Is this a "Special Process Waste", or a "Pollution Is this a "Special Process Waste", or a "Pollution Is this a "Special Process Waste", or a "Pollution Is this a "Special Process Waste", or a "Pollution Is this a "Special Process Waste", or a "Pollution Is this a "Special Process Waste", or a "Pollution Is this a "Special Process Waste", or a "Pollution Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Is this a "Special Waste", and "Industrial Process Waste", or a "Pollution Is this a "Special Waste", and "Industrial Process Waste", or a "Pollution Is this a "Special Waste", and "Industrial Process Waste", or a "Pollution Is this a "Special Waste", and "Industrial Process Waste", or a "Pollution Is this a "Special Waste", and "Industrial Process Waste", or a "Pollution Is this a "Special Waste", and "Industrial Process Waste", or a "Pollution Is this a "Special Waste", and "Industrial Process Waste", or a "Pollution Is this a "Special Waste", and "Industrial Process Waste", or a "Pollution Is this a "Special Waste", and "Industrial Process Waste", or a "Pollution Is this a "Special Waste", and "Industrial Process Waste", or a "Pollution Is this a "Special Waste	A CARA DRILL T # 578 SOIL REVIEW APPAULO RE STORALE DOCK IN NO DE NEW MONTH WOO DE NEW MONT
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to It yes, enter the Waste Identification Number if one has been assigned e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes \(\text{No} \) If yes, enter Waste Identification Number: f) Recommended personal protection equipment and special handling process Identification Number: g) Anticipated Volume: Other Per: Year Month Week Day Drums (type/size)	A CARA DRILL T # 578 SOIL REVIEW APPAULO RE STORAGE DOCK IN NO OF HOW IN THE WOOD REVIEW BY STORAGE DOCK IN NO OF HOW IN THE WOOD REVIEW BY STORAGE DOCK IN NO OF HOW IN THE WOOD REVIEW BY STORAGE DOCK IN THE WOOD REVIEW BY STO
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to It yes, enter the Waste Identification Number if one has been assigned e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution It yes, enter Waste Identification Number: f) Recommended personal protection equipment and special handling process. g) Anticipated Volume: Other Per: Year Month Week Day It yes, be transported in: Bulk Drums (type/size)	A CARA DRILL T # 578 SOIL REVIEW APPAULO RE STORALE DOCK IN NO DE NEW MONTH WOO DE NEW MONT
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to Is this a "Hazardous Waste" as defined by State, Provincial, or local Reflex, enter the Waste Identification Number if one has been assigned e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Pyes	CRAPALL T #578 SOIL PREVIOUS APPAULO PE NO DE TORNE DELLE DORE NO DE TORNE DE
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to Is this a "Hazardous Waste" as defined by State, Provincial, or local Reflex, enter the Waste Identification Number if one has been assigned e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Pyes	I hazardous waste? Yes No so treatment. egulations? Yes No section Yes Ye
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to the life yes, enter the Waste Identification Number if one has been assigned to lis this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes No If yes, enter Waste Identification Number: f) Recommended personal protection equipment and special handling process of the process of the light of	I hazardous waste? Yes No in treatment. Head of the provincial of local Regulations? Yes No in treatment Yes Yes
a) Name/Description of The Waste:	CRAPON T #578 SOIL PREVIOUS RAPPANCO F IN STARMS DOCK NO REVIOUS RAPPANCO F IN STARMS DOCK NO REVIOUS REPORTED OF NO IN TOTAL SHOP THE
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to It yes, enter the Waste Identification Number if one has been assigned It yes, enter the Waste Identification Number if one has been assigned It yes, enter the Waste Identification Number if One has been assigned It yes, enter the Waste Identification Number: Yes No If yes, enter Waste Identification Number: Yes No If yes, enter Waste Identification Number: Yes No If yes, enter Waste Identification Number: Other Per: Year Month Week Day To be transported in: Bulk Drums (type/size) h) Is a representative sample included? Yes No 3. WASTE P	CRAPON T #578 SOIL REVINE APPROVED It hazardous waste? Yes No to treatment. egulations? Yes No Control Waste" as defined by State, Provincial, or local Regulations? Cubic Yards Tons Gallons Cubic Meters Tonnes(metric) One Time Other CROPERTIES AT 72°F e) Density Range: to INDO Ibs/gal. Gg./cc.
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to Is this a "Hazardous Waste" as defined by State, Provincial, or local Relifyes, enter the Waste Identification Number if one has been assigned e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Yes No If yes, enter Waste Identification Number: i) Recommended personal protection equipment and special handling process. g) Anticipated Volume: Other Per: Year Month Week Day To be transported in: Bulk Drums (type/size) h) Is a representative sample included? Yes No Sample Solid Description Combination	CRROBINT #578 SOIL REVIEW RAPPANCO
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted lifyes, describe the waste and the process generating the waste prior to the lifyes, enter the Waste Identification Number if one has been assigned e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Pyes No If yes, enter Waste Identification Number: i) Recommended personal protection equipment and special handling process waste", an "Industrial Process Waste", or a "Pollution Pyes No If yes, enter Waste Identification Number: i) Recommended personal protection equipment and special handling process waste", and "Pollution Pyes" Yes No No Yes No No No No No No No N	CRRPA T & 578 Soll Review Apparel
a) Name/Description of The Waste: b) Process Generating Waste: c) Is this a treatment residue of a waste which was previously a restricted If yes, describe the waste and the process generating the waste prior to It yes, enter the Waste Identification Number if one has been assigned If yes, enter the Waste Identification Number if one has been assigned It yes, enter the Waste Identification Number if one has been assigned It yes, enter the Waste Identification Number: Yes No If yes, enter Waste Identification Number: Waste Identification Number: Yes No If yes, enter Waste Identification Number: Yes No If yes, enter Waste Identification Number: Yes No If yes, enter Waste Identification Number: Waste Identification Number: Yes No If yes, enter Waste Identification Number Identification Number: Yes No If yes, enter Waste Identification Number: Yes No If yes No If yes, enter Waste Identification Number:	CRRPA T & 578 SOIL RREVING RAPANCO
a) Name/Description of The Waste:	CRRPA T # 578 SOIL RREVING RAPANCO
a) Name/Description of The Waste:	CRAPALT #578 Soil Review Reparts
a) Name/Description of The Waste:	CRAPAL T +578 Soll Revious Apparato
a) Name/Description of The Waste:	CRAPALT #578 Soil Review Reparts

,	,	
ELWARTE CODE		

4. REACTIVITY	5. THIS WASTE CONTAINS 6. SPECIAL WASTE COMP	OSITION		
Note if the waste exhibits any of the following reactive properties: Water Reactive Acid Reactive Alkaline Reactive Oxidizer Autopolymerizable Pyrophoric Explosive Thermally Sensitive Shock Sensitive None of the above	Note if the waste contains any of the following: If any are checked "Yes", specify type (if applicable) and include its concentration as part of the waste composition, Section 6. Free Liquids	(%) and/or		
	7_TRANSPORTATION INFORMATION:	er en		
Proper USDOT Shipping Name: USDOT Hazard Class:	UN or NA Number: CERCLA Reportable Quantity.			
	8_SUPPLEMENTAL INFORMATION			
☐ None MSD Sheets	Analytical Data	oosition		
	9 GENERATOR'S CERTIFICATIONS			
I hereby certify that the above at deliberate or willful omissions of not a regulated hazardous waste contain PCBs regulated by TSC	and attached description is complete and accurate to the best of my knowledge and ability to detect composition or properties exist, that all known or suspected hazards have been disclosed, and the by the USEPA, by an applicable State or Provincial authority, or by any applicable local authority A (i.e., 40 CFR 761) or any Provincial authority. SIGNATORY as identified in Section 1 (c):	that the waste is		
	Beauty Telland Environmental PRINT NAME SIGNATURE TITLE	Newser		
	REPRESENTATIVE SAMPLE CERTIFICATION			
This Section is to be completed	by the person obtaining the sample of the above described waste.			
I certify that the sample for whice and preserved in a manner cons	h analytical data was provided on the waste described above is representative of that waste and sistent with accepted technical standards.	was collected		
Lab sample assigned to:	Yor Lass (peel off label)			
Collector's Name: T. C. B'				
Signature:				
Title: Say. Mcc.	Waste Description:			
Telephane Number: (21L) 823-L150 Date Collected: 8124 94				
Date Collected: 8124				
t	•			

- , CLIENT SAMPLE IDENTIFICATION

SOIL, SAND W/ FLD-KOTE 22A

. 0

AMERICAN STEEL FOUNDRIES

94818450

00000

DATE SAMPLED

08/23/94

8450

TIME

11:00

RECEIVED

94 818450

LAB ID NO.

08/26/94 REPORTED

09/13/94

DESIGN TO DEFEND THE LIMITS

	HESULI SANS		HENCE LIMIT	UNITS
TCLP EXTRACTION PROC	FINAL PH=5.01			
ZERO HEADSPACE EXTRT	SAMPLE DESTROYE			41
•	UNABLE TO PERFO	RM VOLATILE AN	LAYSIS.	
	CLIENT NOTIFIED	SAMPLE TO BE	RECOLLECT	red.
TCLP METALS & BIAS %				
ARSENIC	<0.5	0.0	5.0	MG/L
Spike recovery	100			%
BARIUM	0.82	0.0	100.0	MG/L
Spike recovery	96			7.
CADMIUM	<0.03	0.0	1.0	MG/L
Spike recovery	93			%
CHROMIUM	. <0.3	0.0	5.0	MG/L
Spike recovery	102			%
SELENIUM	<0.25	0.0	1.0	MG/L
Spike recovery	105			7.
MERCURY	<0.01	0.0	0.2	MG/L
Spike recovery	102			%
LEAD	<0.2	0.0	5.0	MG/L
Spike recovery	99			7.
SILVER	<0.2	0.0	5.0	MG/L
Spike recovery	94			7.
TCLP SUPPL.METALS				
NICKEL	<0.2			MG/L
Spike recovery	94			%
COPPER	<0.1			MG/L
Spike recovery	90			7.
TCLP BNA'S & BIAS %				
METHOD NUMBER	8270			
CRESOLS	<0.1	0.0	200	MG/L
Spike recovery	23			7.
2,4-DINITROTOLUENE	<0.1	0.0	0.13	MG/L
Spike recovery	32			7.
HEXACHLOROBENZENE 8	<0.1	0.0	0.13	MG/L
Spike recovery	43			%
HEXACHLOROBUTADIENE	<0.1	0.0	0.50	MG/L
Spike recovery	31			%
HEXACHLOROETHANE	<0.1	0.0	3.0	MG/L
Spike recovery	23			7.
₩ <u>₩</u>				

--- DIRECTORS ---

--- PATHOLOGISTS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D.

^ thony Nasrallah Ph.D. Arlington G. Kuklinca M.D.BFI WASTE SYSTEMS

DEYOR METPATH
Laboratories
a CORNING COMPANY

WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225

ATWATER

OH 44201

CLIENT SAMPLE IDENTIFICATION

SDIL, SAND W/ FLO-KOTE 22A

. 0

AMERICAN STEEL FOUNDRIES

94818450

00000

DATE SAMPLED

TIME

08/23/94

2450

11:00

94 818450

RECEIVED

LAB ID NO.

08/26/94 REPORTED

09/13/94

	RESULT	REFE	RENCE LIMIT	UNITS			
NITROBENZENE	<0.1	0.0	2.0	MG/L			
Spike recovery	43			X.			
PENTACHLOROPHENOL	<0.1	0.0	100.	MG/L			
Spike recovery	20			%			
PYRIDINE	<q.1< td=""><td>0.0</td><td>5.0</td><td>MG/L</td></q.1<>	0.0	5.0	MG/L			
Spike recovery	42			%			
2.4.5-TRICHLOROPHEN	<0.1	0.0	400.	MG/L			
Spike recovery	24			7.			
2,4,6-TRICHLOROPHEN	<0.1	0.0	2.0	MG/L			
Spike recovery	21			%			
REACTIVITY SCREEN	REACTIVE CYANIDE	(2.0 PPM					
	REACTIVE SULFIDE	<2.0 PPM					
	ASTM D5049 METHOD	D/D4978 ME	THOD B				
	- -	*					
CORROSIVITY SCREEN	SAMPLE IS NONCORRO						
	ASTM D4980 METHOD	B/USEPA 90	40	•			
IGNITABILITY TEST	SAMPLE HEATED TO			R IGNITION.			
	ASTM D4982 METHOD	B/ASTM D93					
		•					
TCLP REVIEW	•						
	•						
				CU 04/			
	TCLP PREPARATION (
	AS REVISED NOVEMBER 24,1992 (57FR55114)						
	REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR						
	1 1	_		•			
	Must hic	in					
	an or	<u>ب</u>					

--- DIRECTORS --- --- PATHOLOGISTS --Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D.BFI WASTE SYSTEMS

WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225

ATWATER

OH 44201



CLIENT SAMPLE IDENTIFICATION

RESAMPLE

94838327

TIME

03:15

REFERENCE LIMIT

94 838327

RECEIVED

LAB ID NO.

10/04/94 REPORTED

10/13/94

UNITS

AMERICAN STEEL FOUNDRIES

09/30/94 8327

DATE SAMPLED

00000

RESULT

ZERO HEADSPACE EXTRI

TCLP VOA'S & BIAS % METHOD NUMBER VINYL CHLORIDE Spike recovery 1,1-DICHLOROETHYLENE Spike recovery METHYL ETHYL KETONE Spike recovery CHLOROFORM Spike recovery CARBON TETRACHLORIDE Spike recovery BENZENE Spike recovery 1,2-DICHLOROETHANE Spike recovery TRICHLOROETHYLENE Spike recovery TETRACHLOROETHYLENE Spike recovery

CHLOROBENZENE

TCLP REVIEW

Spike recovery 1,4-DICHLOROBENZENE Spike recovery

COMPLETE	10/05/9	74		
SAMPLE D	ISPLAYED	EXCESSIVE	DISSOLVED	GASES

8240			
<0.002	0.0	0.2	MG/L
99			%
<0.002	0.0	0.7	MG/L
93			7.
<1.0	0.0	200	MG/L
98			%
<0.002	0.0	6.0	MG/L
97	V * V	2.5	7
	A A	0.5	MG/L
<0.002	0.0	0.3	7.
96		A =	
<0.002	0.0	0.5	MG/L
89			7.
<0.002	0.0	0.5	MG/L
99			%
<0.002	0.0	0.5	MG/L
96			7.
<0.002	0.0	0.7	MG/L
101			%
<0.002	0.0	100.0	MG/L
. 97			7.
<0.002	0.0	7.5	MG/L
104	910	,	%
104			

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24,1992 (57FR55114) REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

--- DIRECTORS --Patrick K. Jaynes Ph.D. ithony Nasrallah Ph.D.



BFI WASTE SYSTEMS WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 44201 ATWATER OΗ

103



7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY **BROWNING-FERRIS INDUSTRIES**

	Location:	Willow	Cleek		Client#	Win		
Þ	Billing Cont	rci #(Lab use	only)	9	4-27446	,7	<u>a</u>	
	Purchase O	rder#		219-8205				
	Generator/F	roject#	America	n Steel	Founder.	· ·		
	LAB ID#	- 8184	50	WCD #			······································	
	Waste Desc		<u>So/1-80</u>	nd With	Flo KoTe	22 A		
	Number of							
	Matrix	,XSoil	Solid	Multipha	ise	Organ		
	ANALYSES	REQUESTED			RUSH	Y N	\$1000.005 \$1000.005 Court po	
553	. X	TCLP Extrac	ction				10000	
546	\overline{X}	Zero Heads;	pace Extracti	on			p/,000.	
548	X	Metals + s	pika racoverii	es			1100 0051	
544		Supplement	al metals +	spikes(Copp	er & Nickel)		10-2006	
585		UST Priority	/ Panel (Meta	ils + TPH+	Rush Service	≥) <i>()</i> (3 1 10	
578	$\overline{\chi}$	Volatiles +	spike recove	ries		/	مهريم آ	
582	X	_Semi-volatil	es + spike re	coveries			V	
581		_ Pesticides/F	ferbicide <mark>s</mark> + s	pike recover	ies			
1002	<u> </u>	Reactivity S	icreen					
1003	×	Corrosivity	Screen					
859	/×	Ignitability						
511	 7	Total Petrol	eum Hydroca	rbons(TPH)				
569	i	BETX					•	
502		PCB(soil)						
		Other						
245	X	Signatory R	eview				······································	
Sample Tak	en By:		Date	Time	Company			
AT.C	rhan Br	m	8 23 94	11:00 AU	Amer	ican S	Tes/ Foundry	
Sample Sub	omitted By:	\mathcal{O}			•		7	
	ASMUT.	71-	8-26-9	4	BH-0	Willow	creek	
Sample Cou	uriered By:							
hatt	Genc	WO.	8-2G4	13-30	De	101		
Sample Red	eived By:							
Denin			8/24/64.	16:22	DeYor La	boratorie	s	
	77							



7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY BROWNING-FERRIS INDUSTRIES

		5 , (6 00, 10, 10, 10, 10, 10, 10, 10, 10, 10,				. 00	
	Location:	Willow	CVEEK	0	lient#	(265)	
	Billing Conti	cl #(Lab use	only) <u>(</u>	14-274	<u> 377 </u>		
	Purchase O	rder#	21	19-80	757		
	Generator/P	roject#	Amarica	en STe	el Foo	end 1100	
	LAB ID#		\	WCD#_			
	Number of Matrix		¥ Solid	Multiphas	e	Organic/oil	
553 546 546 544 583 578 583 1003 1003 853 51 56	3	Metals + sp Supplement UST Priority Volatiles + Semi-volatile Pesticides/H Reactivity S Corrosivity Ignitability	tion pace Extraction pike recoverie al metals + s Panel (Metal spike recover es + spike rec lerbicides + spi creen	on s spikes(Coppe s + TPH + R ries coveries pike recoveri	ush Servic	Pag. This I Ale hol Rus	sa sesami screwap screwap
24	5 X	Signatory R	leview				
Sample Ta	iken By:		Date	Time	Company		
× Dic	- Bra	lun,	9/30/84	3:15	ASK		
Sample Su	bmitted By:		,		·		
<u> </u>							
Sample Co	ouriered By:						
Aau	ree To	Dock					
Sample R	eceived By:		Υ	1	T		
for	c) Ordo	Ka	10-4-94		DeYor L	aboratories	
	A	1	-				

FOSECO INC.

MATERIAL SAFETY DATA SHEET (29 CFR PART 1910.1200 -HAZARD COMMUNICATION)

SECTION 1 - IDENTIFICATION

30-111

MATERIAL/PRODUCT:

TERRAPAINT 578

MANUFACTURER/DISTRIBUTOR: Foseco, Inc.

ADDRESS: 20200 Sheldon Road

Brook Park, Ohio 44142

MSDS REV. NO.: 2
DATE PREPARED: April 25.

PREPARER: Trevor Hardy

DURING NORMAL BUSINESS HOURS

TELEPHONE: (216) 826-4548

OUTSIDE NORMAL BUSINESS HOURS TELEPHONE: CHEMTREC 1-800-424-9300

SECTION 2 - HAZARDOUS COMPONENTS

HAZARDOUS COMPONENT	CAS NO.	<u>*</u>	USHA PEL	ACGIH TLV (mq/M3)	OTHER LIMITS
Water	7732-18-5	<25	N/A	N/A	N/A
Zircon	14940-68-2	>75	5 as Zr	5 as Zr	N/A
Acrylic Polymer	9003-01-4	<2	N/A	N/A	N/A

<u>SECTION 3 - PHYSICAL/CHEMICAL CHARACTERISTICS</u>

BOILING PT: 212	:`F			SPECIFIC G	RAVI	TY:	2.5	
VAPOR PRESSURE:	N/A		·····	EVAPORATIO	N RA	TE:	N/A	
VAPOR DENSITY:	N/A			SOLUBILITY	IN	WATER:	Contains	water
TREARANCE AND	ODOR:	Blue liquid.	Slight	odor.				
量)			_					

SECTION 4 - FIRE AND EXPLOSION DATA

FLASH POINT:	None				FLAMMABLE	LIMITS:	Lel:	N/A	Wel:	N/A
EXTINGUISHING	MEDIA:	Will	not	burn.						
SPECIAL FIREF	IGHTING	PROCEI	OURE	5: N/A						

UNUSUAL FIRE & EXPLOSION HAZARDS: Sealed drums may generate high pressure internally when exposed to heat or flame.

SECTION 5 - REACTIVITY DATA

STABILITY: Stable INCOMPATIBILITY: None HAZARDOUS POLYMERIZATION: Will not occur. HAZARDOUS DECOMPOSITION PRODUCTS: Oxides of carbon.

N/A = Not Applicable

N/K = Not Known

SECTION 6 - HEALTH HAZARD DATA

OUTE(8) OF ENTRY: INHALATION (YES) SKIN (NO) EYES (YES) INGESTION (NO) EALTH HAZARDS: ACUTE Mists or dusts from dried product may cause irritation f mucous membranes and eyes. Liquid may cause slight skin and eye irritation HEALTH HAZARDS: CHRONIC None known.

N/A TOXICITY DATA:

NTP/IARC/OSHA/OTHER: N/A CARCINOGENICITY:

SIGNS AND SYMPTOMS OF EXPOSURE: Irritation of mucous membranes and

respiratory system.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE: Pre-existing respiratory ailments.

EMERGENCY AND FIRST AID PROCEDURES:

INHALATION: Remove person to fresh air.

Wash with water. SKIN:

Flush with water.

Drink plenty of water. Induce vomiting. Refer to physician.

SECTION 7 - PRECAUTIONS FOR SAFE HANDLING AND USE

SPILLS/LEAKS: Absorb in inert material such as sand.

WASTE DISPOSAL: Dispose of in accordance with local, state and federal

requlations.

HANDLING, USE AND STORAGE: Store below 150 F. Keep from freezing. Replace lid after use to reduce evaporation.

BECTION 8 - CONTROL MEASURES

ESPIRATORY PROTECTION: If PEL/TLV is exceeded use NIOSH approved mask for dusts and mists.

Recommended sufficient to maintain below PEL/TLV VENTILATION:

GLOVES: Rubber or other impermeable. EYE PROTECTION: Safety goggles

OTHER: N/A

N/A = Not Applicable

N/K = Not Known

SIGNATURE OF PREPARER:

Please ensure that all persons coming into contact with this product are aware of the information contained in this MSDS Sheet. Information presented herein has been compiled from sources considered to be reliable and is accurate and reliable to the best of our knowledge and belief but is not guaranteed to be s
It is the user's responsibility to determine for himself the suitability of
any material for a specific use and to adopt such safety precautions as may be necessary. If you need any further information from us to make the determinations which you must make to use this material safely, please contact the above named preparer.

FOSECO INC.

SUPPLIER NOTIFICATION

TERRAPAINT* 578

The above listed product contains no toxic chemical or chemicals subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372, based upon our knowledge of the raw materials comprising this product.

This notification is attached to the product Material Safety Data Sheet (MSDS) and must not be detached from the MSDS. Any copying or redistribution of the MSDS shall include copying and redistribution of this notice attached to copies of the MSDS subsequently redistributed.

Signature of Preparer:

* Registered Trademark

#112,

CHECK OFF APPROPRIATE BOXES) ROUTE OF ENTRY INHALATION SKIN ABSORPTION SKIN ABSORPTION SKIN OF EYE CONTACT HEALTH HAZARDS NO HEALTH HAZARD TOXIC HIGHLY TOXIC HEPRODUCTIVE TOXIN RIFRITANT CORROSIVE SENSITIZER	PyRophos phate- OHEALTH OFLAWMABILITY
☐ CARCINOGEN	
PHYSICAL HAZARDS NO PHYSICAL HAZARDS COMBUSTIBLE LIQUID COMPRESSED GAS COXIDIZER FLAMMABLE GAS EXPLOSIVE FLAMMABLE LIQUID/SOLID PYROPHORIC CORGANIC PEROXIDE CORGANIC PEROXIDE CORGANIC PEROXIDE CORGANIC PEROXIDE CORGANIC PEROXIDE	O PROTECTIVE EQUIPMENT
UNSTABLE (REACTIVE) TARGET ORGANS & EFFECTS	1981
☐ LUNGS ☐ HEART ☐ KIDNEY ② EYES ② SKIN ☐ PROSTATE ☐ BLOOD ☐ LIVER ☐ CENTRAL NERVOUS SYSTEM ☐ CARDIOVASCULAR SYSTEM ☐ MUCOUS MEMBRANES ☐ AUTONOMIC NERVOUS SYSTEM ☐ RESPIRATORY SYSTEM ☐ BLOOD	GLOVES SAFETY GLASSES
☐ MUTAGEN ☐ TERATOGEN	Consult MSDS for further hazardous information and instructions. Reorder No. 810
	1986 Lab Safety Supply Inc

1986 Lab Safety Supply, Inc.

MATERIAL SAFETY DATA SHEET



May be used to comply with OSHA's Hazard Communication Standard, . 29 CFR 1910.1200. Standard must be consulted for specific requirements.

N.A. = NOT APPLICABLE

N.E. - NOT ESTABLISHED

LECEND

I. PRODUCT IDENTIFICATION

Product Name (s):Flo-Kote 22A

Manufacturer: Gene Conreaux & Co., Inc. Telephone: (317) 241-9233 Address: 3637 Farnsworth Avenue Hours: 8:00 a.m. - 5:00 p.m.

Indianapolis, Indiana 46241 Fax:

317 - 248 - 7725

II. HAZARDOUS MATERIAL IDENTIFICATION SYSTEM

CATEGORY	<u>RATING</u>	CEGEMA
Flammability	0	0= Minimal Hazard
Health	0 .	0= Minimal Hazard
) Reactivity	0	0= Minimal Hazard
Personal Protection	B	B= Safety glasses, Gloves

III. HAZARDOUS INGREDIENTS

HAZARDOUS INGREDIENTS	<u>CAS NO.</u>	ACGIH THRESHOLD LIMIT VALUE	% <u>RANGE</u>	OSHA PERMISSIBLE EXPOSURE LIMIT
Mullite(1)	1302-93-8 12068-56-3		>50%	15 mg/m ³ *
Aluminum Oxide	(mixture 1344-28-1)	5-20%	*Em\pm21

^{*} as total dust

⁽¹⁾ This material contains Silicon Dioxide in some form. IARE Monographs on the evaluation of the Carcinogenic Risk of Chemicals to Humans (Volume 42,199 concludes that there is sufficient evidence for the carcinogenicity of crystalline silica to experimental animals, and that there is limited evidence of the carcinogenicity of crystalline silica to humans. IARC Class 2A.

Page 2

Product Name: Flo-Kote 22A

IV. PHYSICAL/CHEMICAL PROPERTIES

Appearance and Odor: White

Water Solubility: Insoluble

Melting Point(oF): 3290

Boiling Range (oF): N.A.

Specific Gravity(water=1): 2.9-3.1

Vapor Pressure (mmHg): N.A.

Percent Volatile by Weight: None

Vapor Density(Air=1): N.A.

Evaporation Rate(Butyl Acetate=1): N.A.

RQ: N.A.

TPQ: N.A.

Flash Point(C.O.C.) (oF): None

Auto-Ignition Temperature(oF): N.A.

Flammable Limits:

LEL None

UEL None

Extinguishing Media: N.A.

Unusual Fire or Explosion Hazards: None

Special Fire-Fighting Procedures: A full facepiece with self contained breathing aparatus is recommended when fighting fires near this product. Wate may be used to cool exposed drums.

VI. CHEMICAL REACTIVITY INFORMATION

Conditions Contributing to Instability: This product is stable and will not react violently with water. Hazardous polymerization will not occur.

Incompatible Materials: None

Conditions to Avoid: N.A.

Hazardous Decomposition Products:N.E.

PRINTED IN U.S.A.

Product Name: Flo-Kote 22A

VII. HEALTH HAZARDS A. Summary/Risks

Signs and Symptoms of Overexposure: Inhalation of dust and mist may cause coughing, sneezing or other symptoms of mucous membrane irritation.

Medical Conditions Generally Aggravated by Exposure: Dust or mist may aggrava pre-existing medical conditions of the respiratory tract.

Primary Route(s) of Entry:Inhalation

Target Organ(s): lungs

Acute Health Effect: Irritation of the mucous membranes of the body.

Chronic Health Effect: Prolonged inhalation of dusts or mists may cause lung fibrosis.

Carcinogenicity: See Page 1.

Notes to Physician: The oral toxicity of this product has not been evaluated.

VII. HEALTH HAZARDS & FIRST AID/EMERGENCY PROCEDURES

Inhalation: If overcome, immediately remove from exposure and seek medical attention.

Skin Contact/Absorption: Wash skin thoroughly with soap and water. If irritation develops, seek medical attention.

Eye Contact: Flush with clear flowing water for at least 15 minutes. If irritation persists, seek medical attention.

Ingestion: If ingested, DO NOT induce vomiting; call a physician immediately.

TON ON WAR DESCRIPTION OF THE PROPERTY OF THE

VIII. SPILL, LEAK AND WASTE DISPOSAL PROCEDURES

Procedures for clean-up of spills/leaks: Spills may be cleaned up using a vacuum or swept up. Keep dust to a minimum. Keep product out of sewer drains (water sources. Notify federal, state, and local agencies if the need exists.

Waste Disposal: Waste generated during application, demolition breakage or spillage are not hazardous waste as defined by RCRA (40 CFR part 261). Place waste and spillage in closed containers. Dispose of in approved landfill in accordance with federal, state and local regulations.

PRINTED IN U.S.A.

Product Name: Flo-Kote 22A

PROTECTION AND CONTROL INFORMATION IX.

_______ Hygienic Fractices: Minimize breathing vapors, mists, fumes or dusts. Avoid prolonged or repeated contact with skin. Remove contaminated clothing, launder before reuse. Remove contaminated shoes; clean before reuse.

Ventilation Requirements: Provide ventilation sufficient to prevent exceedir recommended exposure limits.

Respiratory Protection: Use NIOSH approved respirator when conditions exceed recommended exposure limits.

Eye Protection: Use safety glasses, splash goggles or face shield when eye contact may occur.

Protective Gloves: Use chemical-resistant gloves, if needed, to avoid prolonged or repeated skin contact.

Other Clothing and Equipment: As required to prevent contact.

Engineering Controls/Work Practices: Keep containers and storage containers closed when not in use.

Special Considerations for Repair/Maintenance of Contaminated Equipment: Provide adequate respiratory, eye and skin protection.

PRECAUTIONS FOR SAFE HANDLING AND USE

Storage Segregation: Always segregate materials by major hazard class.

Special Handling/Storage: Do not transfer contents to unlabeled container(s)

Other: Comply with all federal, state and local regulations.

DOT SHIPPING REQUIREMENTS XI.

Shipping Name: Foundry Core Compound N.O.I

Hazard Class:None

Identification Mumber: None

Label (s) Required: None required

Date Prepared: 10/26/87

Prepared/Revised by: Chris Froderman

Date Revised: 10/17/99

Title: Chemist

As of the date of preparation of this document, the forgoing information is believed to be accurate and is provided in good faith to comply with applicable federal and state law(s). However, no warranty or representation with respect to such information is intended or given. FRINTED IN U.S.A.

LO-KOTE 22 A (CHECK OFF APPROPRIATE BOXES) EALTH ROUTE OF ENTRY MHALATION

SKIN ABSORPTION

INGESTION

SKIN OR EYE CONTACT HEALTH HAZARDS NO HEALTH HAZARD
TOXIC
HIGHLY TOXIC
REPRODUCTIVE TOXIN ☐ IRRITANT ☐ CORROSIVE SENSITIZER
CARCINOGEN PHYSICAL HAZARDS NO PHYSICAL HAZARDS
COMBUSTIBLE LIQUID
COMPRESSED GAS
COMPRESSED GAS **PROTECTIVE** ☐ FLAMMABLE GAS
☐ EXPLOSIVE
☐ FLAMMABLE LIQUID/SOLID
☐ PYROPHORIC
☐ ORGANIC PEROXIDE
☐ WATER REACTIVE
☐ HINSTARIE GREACTIVE
☐ ORIGINATION OF THE PROPERTY OF **EQUIPMENT** ☐ UNSTABLE (REACTIVE) TARGET ORGANS & EFFECTS LUNGS

HEART
KIDNEY
EYES
SKIN
PROSTATE

Consult MSDS for further hazardous information and instructions.

Reorder No. 810

☐ BLOOD
☐ LIVER
☐ CENTRAL NERVOUS SYSTEM
☐ CARDIOVASCULAR SYSTEM
☐ MUCOUS MEMBRANES

☐ BLOOD ☐ MUTAGEN ☐ TERATOGEN

AUTONOMIC NERVOUS SYSTEM
RESPIRATORY SYSTEM

1986 Lab Safety Supply, Inc.



Willowcreek Landfill District

November 22, 1994

Mr. Terry C. Bradway Facilities Engineer American Steel Foundries 1001 East Broadway Alliance, Ohio 44601

Dear Mr. Bradway,

It is again time to recertify your waste streams listed below. This year we will need for each waste stream a new waste profile form and current analytical testing. TCLP Metals including Copper, Nickel and Zinc.

If you would like assistance in sampling & testing, please call me to set up an appointment.

Thank you for your cooperation and continued concern for our environment.

Waste Streams:

- 1. OH 855 950212 202142 006 SPENT FOUNDRY SAND
- 2. OH 855 950212 202143 006 FLOOR SWEEPINGS
- 3. OH 855 950212 202144 006 REFRACTORY
- 4. OH 855 950212 202145 006 BROKEN CORE BUTTS

Sincerely,

Al Casanta

Industrial Waste Specialist

AC/pr



American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150 FAX NO. (216) 821-4568

October 04, 1994

CERTIFIED LETTER RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, HRE-8J U.S. EPA, Region V 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Barbara Mazur

Chief, SWERB Section V Office of Regional Counsel U.S. EPA Region V, 5CS-TUB3 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Richard Clarizio REGEIVED OCT 1 1 1994

Z 309 033 155

OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

Z 309 033 156

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

Progress Report # 10

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

5. After implementation of the Alliance Closure Plan, only in the event that clean closure cannot be achieved, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a Alliance Post Closure Plan in accordance with the requirements of 40 C.F.R. # 265.117 through 265.120 and Ohio Admin. Code # 3745-66-17 through 20. If Ohio EPA does not approve the Alliance Post Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or Modified Alliance Post-Closure Plan, in accordance with 40 C.F.R.# 265.118 (d) (4) and (f) and Ohio Admin. Code # 3745-66-18 (D) (4) and (F). Immediately upon receipt of final approval or modification of the Alliance Post-Closure Plan by Ohio EPA, Defendant shall implement such Plan.

In a June 10, 1994 letter Mr. J. F. Oesch, Plant Manager, American Steel Foundries, submitted the Background Sampling Analysis Report for the Electric Arc Furnace Baghouse Hazardous Waste Management Unit in accordance with Mr. John Palmer's Ohio EPA letter of May 09, 1994.

In a June 15, 1994 letter to Mr. Terry Bradway of American Steel Foundries, John Palmer acknowledged Ohio EPA receipt of the Background Sampling Analysis Report.

Closure of the Electric Arc Furnace Baghouse Waste Management Unit was undertaken during our plant vacation shutdown in the first two weeks of August 1994. Excavation was performed to the base of the foundations in the entire unit in order to attempt clean closure. A concrete slab was poured over the back filled excavation during the third week of August and a documentation of closure is being prepared for submittal in early October. It will include a risk assessment for the contaminated material of concern remaining in the unit.

D. SEBRING FACILITY -Closure and Post Closure Requirements:

2. If Ohio EPA does not approve the Sebring Closure Plan or the Post-Closure Plan, Defendant shall submit to Ohio EPA, with a copy to U.S. EPA, a revised or modified Sebring Post-Closure Plan, in accordance with Ohio Admin. Code # 3745-66-12(D)(4).

In a June 01, 1994 letter to Mr. Donald R. Schregardus, Director Ohio EPA, American Steel Foundries requested a meeting with the agency to discuss beneficial reuse of foundry wastes and possible modifications to the landfill cap design.

On July 25, 1994 a meeting was held between Ohio EPA and American Steel Foundries at the Ohio EPA Northeast District Office in Twinsburg, Ohio to discuss Sebring Landfill Closure Plan issues and waste reduction. As a direct result of that meeting the cap outlined in the closure plan document is being redesigned and a modified closure plan is being prepared.

In an August 05, 1994 letter to Mr. Donald R. Schregardus, Director Ohio EPA, American Steel Foundries withdrew the Landfill Closure Plan dated January 1993 and stated that a revised plan would be submitted no later than December 15, 1994. The revised plan will include issues critical to the Ohio EPA and American Steel Foundries as outlined in the August 05, 1994 letter and discussed in the July 25, 1994 meeting.

On September 13, 1994 four members of the Ohio EPA were invited guests at a Waste Reduction Committee Meeting held at the Alliance Plant of American Steel Foundries and were thoroughly briefed on the waste reduction activities at that plant. After the meeting, the guests toured the facility. Mr. John Palmer met with Mr. R. M. Locke and Ms. B. M. Wellman following the meeting to discuss various closure activities.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

- 1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."
- 3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.
- 4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.
- 5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.
- 6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA

and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

In a June 28, 1994 letter to Mr. Terry Bradway of American Steel Foundries, Mr. John Palmer from Ohio EPA listed his notice of deficiencies for the February 23, 1994 Groundwater Sampling Report of the December 14 through 17, 1993 sampling of the groundwater monitoring wells at the Sebring Landfill.

In a July 22, 1994 letter subtitled "Groundwater Sampling Report Response to Comments" American Steel Foundries responded to Mr. John Palmer's June 28, 1994 notice of deficiencies letter.

In a July 15, 1994 letter from Mr. John Palmer of the Ohio EPA to Mr. Terry Bradway at American Steel Foundries, John listed a notice of deficiencies for the Supplementary Annual Report for the 1993 Ground Water Monitoring of the Sebring Landfill.

In a July 22, 1994 letter subtitled "Response to Groundwater Comments", American Steel Foundries Addressed Mr. Palmer's notice of Deficiencies from the July 15, 1994 letter.

In a July 22, 1994 letter to Mr. Terry Bradway of American Steel Foundries, Mr. John Palmer of the Ohio EPA listed his notice of deficiencies for the May 09, 1994 "Sampling Report No. 2" covering the March 15 through 16, 1994 sampling of the groundwater monitoring wells at the Sebring Landfill.

In a July 27,1994 letter subtitled "Groundwater Sampling Report Response to Comments", American Steel Foundries responded to Mr. Palmer's July 22, 1994 correspondence.

In an August 05, 1994 Letter subtitled "Sampling Report No. 3" from Mr. John Oesch, Plant Manager, American Steel Foundries submitted the sampling report for the June 15 through 17, 1994 sampling of the groundwater monitoring wells at the Sebring Landfill.

RMT Inc. performed the fourth sampling of the monitoring wells the week of September 12, 1994. The test results from the sampling have not been received to date.

RMT Inc. is preparing a summary report of the first four quarterly sampling events in accordance with the approved Groundwater Quality Assessment Plan for the Sebring Facility.

TEST RESULTS AND SAMPLING SUMMARY

Our experiments to reduce lead and cadmium in Electric Arc Furnace dust continue.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period. Our scrap mixture was changed in January of 1994 to include the addition of 10% obsolete plate. Its impact on our furnace operation is being evaluated.

American Waste and BFI have also sampled several waste streams during the previous period and test results have been received. See attachment "B" $\,$

Waste stream profile test results for the soil removed from under the Electric Arc Furnace Baghouse Hazardous Waste Management Unit were determined to be nonhazardous by "TCLP" analysis and are included in attachment "C".

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Court very truly,

J. F. Oesch PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW

JW

RML

RBR

Ohio EPA Z 309 033 157

Chief, Division of Solid and Hazardous Waste

1800 WaterMark Drive

P.O. Box 1049

Columbus, Ohio 43268-0149

Ohio EPA Z 309 033 158

Division of Solid and Hazardous Waste

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Ohio EPA Z 309 033 159

Supervisor, division of Solid and Infectious Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.

Amsted Industries, Inc.

44th Floor - Boulevard Towers South

205 N. Michigan Ave.

Chicago, Illinois 60601

P. C. Schillawski Z 309 033 160

Squire Sanders & Dempsey

4900 Society Center

127 Public Square

Cleveland, Ohio 44114-1304

Mahoning County Health District Z 309 033 161

Chief, Solid Waste Program

2801 Market Street

Youngstown, Ohio 44507-1649

Attn: R.D.Setty

C:\WP51\HAZWASTE\USVAMSTD.TB3

ATTACHMENT "A"

RESAMPLE SAMPLE ANALYSIS REQUEST FORM

ENVIRITE CORPORATION

Generator Name:	AMERICAN STE	EL FOUNDRIE	S	<u></u> -	
Facility Address:	1001 E. BROA	DWAY ST.			
	ALLIANCE	OHIO		44601	
Stream Number:	CS1373		state Date Results Need		ZIP
Waste Code:	D006, D008	<u></u> :	Frequency:	EACH BOX	
Volume:					
Generator's Description	on / Identification of W EAF FURNACE				
	D006, D008				
Comments:					
	TCLP METALS	ONLY			
· ·	SAMPLE NO. O	91594 A	BOX NO.	No No.	
Request Submitted b	y: T.C.BRADWAY		Date Submitted:	9/15/94	
CERTIFICATION:				÷.,	
this document is remyself as both the s	designated the location of the sentative. In the sampler and witness is are correctly identi	event that I per in the spaces bel	imple collection and sonally collected the ow. If I have not collected	the sample accomp e sample, I have id lected the sample, b	anying entified oth the
Date of Sampling:	9/15/9	Ч	Time of Sampling:	Composite	_AM/PM
Sampler's Name:	<u>T</u>	.C.BRADWAY			
Title and Affiliation of	Sampler: <u>ENVIRO</u>	NMENTAL MANA	GER, AMERICAN S	STEEL FOUNDRIE	S
Sampler's Signature:	~	souther &	<u> </u>		
Witness's Name:	• .			-	
Title and Affiliation of	f Witness:				
Witness's Signature:				\supset	
ENVCHCDY.EAF	5h	_ C.M	.000		
Ple.	ase submit sample pro	emptly. Organic at	nalyses must be`comp	oleted within	

14 days of sample collection; otherwise, resampling will be necessary.

Recycled Paper 🐯

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 09/14/94 Envirite Waste ID#: CS1373 Sample Collection Date: 09/01/94
Date Analysis Completed: 09/09/94

Waste Description: EAF Furnace Dust

BOX #: 118

Parameter	Results
pH (TCLP)	6.73 S.U.
Total CN (As Received)	0.55 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	1.5 mg/L
TCLP Chromium	0.12 mg/L
TCLP Lead	6.5 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	< 0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirte facilities. Envirte makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

IA/RC Coordinato

cc: File TSR: tmc

FAX	#Pages - 1	From: CHERYL HAWKINS		
TO: TERRY BRADWAY		ENVIRITE CORPORATION		
CO: AMERICAN S	TEEEL FOUND.	Phone: 216-456-6238		
FAX#: 216-821-4568		FAX#: 216-456-2801		

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Allance, Ohio 44601

Report Date: 08/12/94 Envirite Waste ID#: CS1373

Sample Collection Date: 08/01/94
Date Analysis Completed: 08/10/94

Waste Description; EAF Furnace Dust BOX #: 110

Parameter	Results
pH (TCLP)	6.6 S.U.
Total CN (As Received)	0.56 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	2.1 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	6.8 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	0.011 mg/L
TCLP Silver	<0.082 mo/l

This energies was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

QA/RC Coordinator

cc: File

	FAX #Pages - 1		From: CHERYL HAWKINS		
	TO: TERRY BRADWAY		ENVIRITE CORPORATION		
.	CO: AMERICAN STEEL FOUND.		Phone: 210-456-5235		
	FAX#: 215-821-4568		FAX#: 216-456-2801		

RESAMPLE SAMPLE **ANALYSIS** REQUEST **FORM**

ENVIRITE



Generator Name: Facility Address:	AMERICAN STEEL		5	1-2
,	ALLIANCE	OHIO		44601
Stream Number:	City CS1373		State Date Results Need	7 TO 10 DAYS
Waste Code:	D006, D008			ЕАСН ВОХ
Volume:				
Generator's Descripti	on / Identification of Wast EAF FURNACE DU			
	D006, D008			
Comments:				· · · · · · · · · · · · · · · · · · ·
	TCLP METALS OF	NLY		
	SAMPLE NO. 08	01948	BOX NO.	110
Request Submitted b	y: T.C.BRADWAY		Date Submitted:	8/1994
CERTIFICATION:				
myself as both the	designated the location epresentative. In the ersampler and witness in as are correctly identifie	vent that I per the spaces bel	imple collection and sonally collected to ow. If I have not co	d the sample accompanying ne sample, I have identified illected the sample, both the
Date of Sampling:	8/1/94		Time of Sampling	: Composite AM/PM
Sampler's Name:	T.C	.BRADWAY	-	
Title and Affiliation o	f Sampler: <u>ENVIRON</u> M	ENTAL MANA	GER, AMERICAN	STEEL FOUNDRIES
Sampler's Signature		affer 1	- June	
Witness's Name:	·			·
Title and Affiliation o	f Witness:	<i>7</i> 3	<u> </u>	
Witness's Signature:	J. 1110	<u>{ </u>		
ENVCHCDY.EAF				

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

Aesvoer Parer 🚓

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 08/05/94 Envirite Waste ID#: CS1373 Sample Collection Date: 07/26/94 Date Analysis Completed: 08/02/94

Waste Description: EAF Furnace Dust

BOX #: 111

Parameter	Results
∞рН:(тсье)	6.2 S.U.
Total CN (As Received)	1.0 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barlum	<1.6 mg/L
TCLP Cadmium	2.4 mg/L
TCLP Chromium	<0.10 mg/L
TCLP Lead	10.0 mg/L
TCLP Mercury	0.0015 mg/L
TCLP Nickel	0.42 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

QA/RC/Coordinator

cc: File

FAX #Pages - 1		From: CHERYL HAWKINS		
TO: TERRY BRADWAY		ENVIRITE CORPORATION		
CO: AMERICAN STEEEL FOUND.		Phone: 216-456-6238		
FAX#: 216-821-4568		FAX#: 216-456-2801		

RESAMPLE SAMPLE **ANALYSIS** REQUEST **FORM**

ENVIRITE CORPORATION

Generator Name:	AMERICAN ST	EEL FOUNDRIE	S	
Facility Address:	1001 E. BRO	ADWAY ST.		
	ALLIANCE	OHIO		44601
Stream Number:	city CS1373		State Date Results Neede	7 TO 10 DAYS
Waste Code:	D006, D008		Frequency:	
Volume:		· · · · · · · · · · · · · · · · · · ·		
Generator's Descripti	on / Identification of V EAF FURNACE			
	D006, D008			
Comments:				
Comments.	MCID MEMAIC	ONLY		
	TCLP METALS	<u> </u>		
	SAMPLE NO.	072694 A	BOX NO.	(11
Request Submitted b	oy: T.C.BRADWAY	<u> </u>	Date Submitted: _	7/21/94
CERTIFICATION:				
I certify that I have this document is re myself as both the	epresentative. In th	e event that I per s in the spaces bel	sonally collected the	the sample accompanying s sample, I have identified ected the sample, both the
Date of Sampling:	7/26	94.	Time of Sampling:	Composite AM/PM
Sampler's Name:		r.C.BRADWAY		· · · · · · · · · · · · · · · · · · ·
Title and Affiliation of	f Sampler: <u>ENVIR</u> O	ONMENTAL MANA	GER, AMERICAN S	TEEL FOUNDRIES
Sampler's Signature		when	~~	· · · · · · · · · · · · · · · · · · ·
Witness's Name:				
Title and Affiliation of	of Witness:			
Witness's Signature	·			
ENVCHCDY.EAF	•			

RESAMPLE SAMPLE **ANALYSIS** REQUEST **FORM**

ENVIRITE



SAMPLE LOST

Generator Name:	AMERICAN ST	EEL FOUNDRIE	S	et s		
Facility Address:	1001 E. BROADWAY ST.					
,	ALLIANCE	OHIO		44601		
Stream Number:	City CS1373		State Date Results Ne	zıp deded: TO 10 DAYS		
Waste Code:	D006, D008		Frequency:	EACH BOX		
Volume:						
Generator's Descript	ion / Identification of V EAF FURNACE					
	D006, D008					
			<u>, , , , , , , , , , , , , , , , , , , </u>			
Comments:						
	TCLP METALS	2 ONLY				
	SAMPLE NO.	070594A	BOX NO.	120		
Request Submitted	by: <u>T.C.BRADWA</u>	Υ	Date Submitted	1: 7/6/94		
CERTIFICATION:						
I certify that I have this document is i	renresentative in f	he event that I pe is in the spaces be	rsonally collected	and the sample accompa I the sample, I have ider collected the sample, bo	itified	
Date of Sampling:	7/5	194	Time of Sampli	ing: Composite A	M/PN	
Sampler's Name:		T.C.BRADWAY				
Title and Affiliation	of Sampler: _ENVIR	ONMENTAL MAN	AGER, AMERICA	N STEEL FOUNDRIES		
Sampler's Signature	e:	C. Branks	~~ <u>~</u>			
Witness's Name:						
Title and Affiliation	of Witness:					
Witness's Signature	e:				<u></u>	
FNVCHCDV FA	េ					

DATE

: 08/31/94

BFI Location

WILLOWCREEK LF

Brī Initiator

CABANTA, A.

Generator

AMERICAN STEEL FOUNDRIES

Generator Location : ALLIANCE, OH

: SOIL/LIMESTONE/SLAG/SAND/DUST

Waste Description

AB39088

MCD Number

BRI Number

221794

WASTE APPROVAL FORM

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial:

Facility. BFI Mahoning, Willowcreek, Lorain, & Glenwillow

Comments:

Approved for one time only disposal.

The following items were received by the Corporate Waste Approval Group:
a. Analytical data from Quanterra Environmental Services
b. Chains of Custody

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition & physical properties to that sa defined above. This waste stream has been assigned BFI Waste Code: OH/855;219;218;217/950831/221794

SER PATRACHMENT "C" FOR TCLP INFO

CORPORATE WASTE APPROVAL GROUP

TECHNICAL REPRESENTATIVE

☐ 9.1 - 12.4 ☐ ≥ 12.5 ☐ N/A X N/D

None ☐ Mild ☐ Strong

04 355,019-218, 950831, 201799

3ROWNING-FERRIS INDUSTRIES WASTE APPROVAL REQUEST BFI to complete this area. BFI Initiator: /// (asken Tu Location: //////////// Action Requested: HNew Waste Approval ☐ Up-Date Approval - Previous Number: Disposal Site Requested: 4/1 4/8 3-49 8-51 Company Number: 217 /6//
Telephone: (3/6) 947 359 Company Number: _____ Fax: (2/6) F47-7724 Management Method Requested: ALandfill Hauling WASTE CHARACTERIZATION DATA SPECIAL WASTE IMPORTANT: THIS FORM IS TO BE COMPLETED BY A REPRESENTATIVE OF THE WASTE GENERATOR, PLEASE READ THE INSTRUCTIONS BEFORE COMPLETING THIS FORM. THIS FORM IS TO BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY PRINTED IN INK, AND SIGNED. 1. GENERATOR INFORMATION a) Generator's Name: AMERICAN STEEL FOUNDRIES e) State/Provincial/Local Registration No.: M/A b) Generating Facility's Address: 1001 E. BROADWAY ST. Generator's EPA Id. No.: 01+10981090418 City: Allance State-OH Zip: 44661

c) Generator's Representative: T.C. BROWN

Title: EHVIRONMENTAL MANAGER Industry Description/SIC Code: 3325 f) Customer's Name: Space Telephone: (214) 823-6150 g) Customer's Mailing Address: _____ Fax: (216) 823-6150 City: _____ State: ___ Zip: ____ d) Emergency/Information Contact: Same h) Representative: Telephone: () ______ Fax: (Telephone: (2. GENERAL WASTE STREAM INFORMATION a) Name/Description of The Waste: Soil, Limes Tone, Stacfeno, Feur Day Samo and FAR Dist
b) Process Generating Waste: CLEAR UP CLOSORE UNDRE FAF DIST COLLETOR (FAF USED W SECONDARY STEEL PRODUTING) c) Is this a treatment residue of a waste which was previously a restricted hazardous waste? ☐ Yes ☒ No If yes, describe the waste and the process generating the waste prior to treatment. __ d) Is this a "Hazardous Waste" as defined by State, Provincial, or local Regulations?

Yes
No If yes, enter the Waste Identification Number if one has been assigned: ______ e) Is this a "Special Waste", an "Industrial Process Waste", or a "Pollution Control Waste" as defined by State, Provincial, or local Regulations? f) Recommended personal protection equipment and special handling procedures: Other Per: Year Month Week Day Mone Time Other To be transported in: 13 Bulk Drums (type/size) ______ Dother___ h) Is a representative sample included? XYes ☐ No 3. WASTE PROPERTIES AT 72°F a) Physical State: e) Density Range:____ **∑**(Solid MN/D □ lbs/qal. □ q./cc. □ Semi-solid □ lbs./yd.3 □Kg/m3 □ Other ☐ Powder ☐ Liquid □ Combination f) Flash Point, °F: b) Layers: Single-layered □ Bi-layered □ Multi-layered □≤72 □73-100 □101-140 ☐ 141-200 ☐ ≥ 201 ☐ N/A XN/D Describe BLACK, BROWN, TAN, REDISHBROWN d) Odor: g) pH: $\square \le 2 \square 2.1 - 5.0 \square 5.1 - 9.0$ Describe ____

BFI WASTE CODE

	•		5117476763						
	4. REACTIVITY	5, THIS WAS	TE CONTAINS		6. SPECIAL WASTE	COMPOSITION			
	Note if the waste exhibits any of the following reactive properties: Water Reactive Acid Reactive Oxidizer Autopolymerizable Pyrophoric Explosive Thermally Sensitive Shock Sensitive	If any are checked "Ye" (if applicable) and incluas part of the waste co	ide its concentration		Concentration ranges are must be identified in perce parts per million (ppm). Att necessary. Components Some LimesTouc Slace Foundry Some TAF Dust	ntages (%) and/or			
rii.		pa .	<u>-</u>						
L F		7. TRANS	SPORTATION INFORMATI	ON.					
	If the waste is a DOT Hazardous Meroper USDOT Shipping Name: _USDOT Hazard Class:				CERCLA Reportable Qua	ntity:			
.		8 SUP	PLEMENTAL INFORMATIC	N.		The second secon			
1	☐ None ☐ MSD Sheets ☐ Other - describe:	X Analytical Data	☐ Chain of Custody		Memo/Letter ☐ Waste	e Composition . of Pages:			
		g GEN	ERATOR'S CERTIFICATIO	IN.	24_C/_201642-416420-7				
	I hereby certify that the above and deliberate or willful omissions of contain PCBs regulated by TSCA GENERATOR'S AUTHORIZED S	composition or properties ex by the USEPA, by an applic (i.e., 40 CFR 761) or any P SIGNATORY as identified in	ist, that all known or suspectable State or Provincial autorovincial authority. Section 1 (c):	cted I hority	hazards have been disclosed	d, and that the waste is authority, and does not			
		eadury Til	SIGNATURE		TITLE	hickory whom I pro-			
27.64	DATE		the second secon		The Market Control of the Control of	Lander Statement and colored to			
[REPRESENT	TATIVE SAMPLE CERTIFIC	CATI					
	This Section is to be completed by I certify that the sample for which					ste and was collected			
	and preserved in a manner consis	stent with accepted technica	al standards.						
(Lab sample assigned to: QUA		(peel off la	uel)					
	Collector's Name: TEARY								
	Signature:		Generator's N	ame:					
	Company: American S		_						
	.itle: Environment								
691	Telephone Number: (2/6) 82	3-6150 EXI # 20	4		39088				
	Date Collected:		Date Collected: August 2 Theoret 13,1994 WCD No. AB 39088						

WASTE PROFILE INFORMATION ORM

EUAIISILE



CS1762

If you need help with this form, please consult your Envirite Technical Marketing Representative or refer to Instructions for Completing Waste Profile Information Form.

I. CUSTOMER INFORMATION:			
Name of Generator American Steel Fou	ndries.	SIC	
Facility Address 1001 5 Broadway Street	Alliance	pll.	44601
Pickup Address 1001 5 Broad way Street	Alliance	State O/1	. zir 44601
Primary Contact Terry Bradway	_ Title _EAL_ M3Y.	Phone 21/6	zr - 821-6150
Primary Contact <u>Terry Bradway</u> Technical Contact <u>Terry Bradway</u>	Title Enn Mar.	Phone 216	-871-6/50
Emergency Contact Terry Brakwag	_ After-hours Phone 216 - 3.	21-6150	
Parent Company n/H.			
Generator USEPA ID# 0H0 981090 418	_ Generator State ID#	14	
Customer Address for Invoicing American 5to	rel Foundries		
P.O Box 2060	Alliance	011.	44601
/ Street	City	State	ZIP
	Contact	Phone	
II. WASTE INFORMATION:	DH		
Generator's Description/Identification of Waste Soil from	m Area "I" class	جنبر بر- 1	
Physical State at 20°C (68°F) — (Check one box.) ☑ Solic	f ☐ Powder ☐ Sludge	☐ Liauid	
Other Characteristics — (Must complete "Color" and "Number			
Color Black / Brown TOX UNK ppm			Liquid ->
Number of Phases / Oils/Grease	TOC CALL nom	Flach Point	Liquiu OF
	Percent Solids 100		
Consiste Olever M. II. J. (O.)	1 ordent donas 100	ριτ <u>υνοκ</u>	
Generator Storage Method — (Check one box.)		• •	
☐ Tank ☐ Roll Off ☐ Dump Trailer ☐ Bags ☐		ent 🗆 Other	
	omments		
	If "yes," describe		
Does this waste produce any explosive, combustible or toxic gas	es upon neutralization with lime?	☐ Yes ☐ No)
Comments:	49.14		
Waste Quantity: Estimated Volume	_ Estimated Frequency/_	X	
SHADED AREA FOR ENVIRITE USE ONLY	Stormananasuus yhtyöyimmansanasuu (***********************************		
STREAM NUMBER DATE ENTER	RED DATE I	NEEDED -	
TREATMENT FACILITY: Canton Harvey	York TMR		

V. WASTE CONSTITUENTS:

The waste constituent information may be supplied either on the basis of the generator's knowledge or laboratory analysis. It must be comprehensive, as it will be used to ensure the health and safety of our laboratory personnel and as a comparison to Envirite's analysis of the representative sample submitted. Please address each line entry. Also, note that "TOTAL," not leachable, concentrations are requested below. All unmarked units will be assumed to be mg/kg. If other units are used, please include the proper units with the concentration. If you need help with this section, consult your Envirite Technical Marketing Representative or refer to *Instructions for Completing Waste Profile Information Form.*

METALS	VOLATILE ORGANIC COMPOUNDS	
TOTAL CONCENTRATION	TOTAL CONCENTRATIO	M(
Aluminum Arsenic Barium Beryllium Boron Cadmium Chromium Chromium Chromium (+6) Copper Iron Lead Manganese Mercury Nickel Selenium Silver	Acrylonitrile (vinyl cyanide) Benzene Bis(chloromethyl) ether Methylene chloride Methylchlormethyl ether Methyl ethyl ketone Tetrachloroethylene Trichloroethylene Vinyl chloride Carbon tetrachloride Chloroform Other Other Other SEMI-VOLATILE ORGANIC COMPOUND	
Tin	TOTAL CONCENTRATION	ON
ANIONS TOTAL CONCENTRATION Chloride Sulfate Nitrate Flouride Phosphate CHELATING AGENTS TOTAL CONCENTRATION Ammonia Cyanide Total	1,2-Diphenylhydrazine 1-Naphthylamine 2-Naphthylamine Anthracene Benzidine Dioxins Ethyleneimine N-Nitrosodimethylamine p-Nitrosodiphenylamine Phenol Other Other Other Other	
Cyanide Amenable Cyanide Leachable — \	TOTAL CONCENTRATI	ON
Other	Asbestos Carcinogens Herbicides PCBs Pesticides Radioactives Solvents Organometallic Compounds Other Other Other	

III. PROCESS INFORMATION:	
The information provided in this Section will be used by Envirite to ver in detail the process which generates this waste. (Include plating actimetals being plated.) It is important for this information to describe the process that first causes the waste to be regulated as hazardous.	vity [i.e., nickel, chrome, copper], raw solutions and base e process that actually generates the waste, namely the
Krea Closure activities at	two years inside facility
This is a composite of free	The company of the contract of
This is a composite of frea	A only.
Are other products used in this area which may contaminate the wast maintenance personnel)? Yes No If "yes," identify may available.	e (i.e., cleaning solutions or any other chemicals used by
Material:	
Are paint-stripping operations on site? Yes No	
Are cyanide-plating operations on site? Yes No	
IV. HAZARDS INFORMATION:	
Is the waste a RCRA Hazardous Waste as described per 40 CFR 26 Please identify all EPA Hazardous-Waste Numbers which apply to the specified below. In the blank space(s) provided, please specify any (e waste by placing an "X" in the box next to the codes
Characteristic Hazardous Wastes	Listed Hazardous Wastes
□ D001 (Oxidizers) □ D007 (Chromium) □ D002 (Corrosive) □ D008 (Lead) □ D003 (Reactive) □ D009 (Mercury) □ D004 (Arsenic) □ D010 (Selenium) □ D005 (Barium) □ D011 (Silver) □ D006 (Cadmium) □ Other	☐ F006 ☐ K002 ☐ K007 ☐ F007 ☐ K003 ☐ K008 ☐ F008 ☐ K004 ☐ K062 ☐ F009 ☐ K005 ☐ F011 ☐ K006 ☐ F012 ☐ F019 ☐ Other
Does the waste contain free liquid?* ☐ Yes ☐ No	
Is the waste subject to Land Disposal Restrictions (LDR) per 40 CFR	t 268 or its equivalent state regulations? ☐ Yes ☑ No
Does this waste require treatment to conform to Land Disposal Restr	
Per the LDR program's definition, the waste is a: Wastewater†	and
Has EP Toxicity, TCLP or any other testing been done? Yes reports.	
Does the liquid portion of the RCRA Hazardous Waste contain nicke	I ≥ 134 mg/l?
Does the liquid portion of the RCRA Hazardous Waste contain thalling	um ≥ 130 mg/l? ☑ No □ Yes Specifymg/l
If the waste is not a RCRA Hazardous Waste as described by federa state from which it is being shipped? Yes No No	
* As determined by Method 9095 (Paint Filter Liquids Test) describe Physical/Chemical Methods." (EPA Publication No. SW-846, 2nd ed	
† "Wastewaters" are wastes that contain less than 1% total organic (Nonfilterable Residues Test — Method No. 160.2 Methods for Cher March 1983).	
-7.	

VI. TRANSPORTATION INFORMATION:						
Proper DOT Shipping Name <u>Ran regulated</u> ,						
OOT Hazard Class						
Will the temperature of the waste to be transported ever be greater than 110°F? Yes SFNo						
Comments:						
Are special precautions required at the time of pickup? Yes No	If "yes," indicate precautions:					
Is Envirite handling transportation?	If "no," and you know who will be transporting the					
waste, please complete the following information:						
Transporter Name						
Transporter EPA ID#						
Transporter Contact	Phone					
After-hours Emergency Contact	Phone					
Please submit sample promptly. Organic anal within 14 days of sample collection; otherwise, re	yses must be completed					
Date of Sampling 8 2294 Time of Sampling 11:10	AM/RM					
Sampler's Signature C. B. Sund						
Sampler's Name T. C. BRADWAY Title and Affiliation of Complex 5. 22.2.2. Print Title and Affiliation of Complex 5. 22.2.2.						
Title and Affiliation of Sampler Favironmental M	IRACER AMERICAN STEEL FOUNDRIES					
VIII. CERTIFICATION:						
I hereby avow that any pertinent information that is known by the general disclosed in the information contained herein and attached to this form for sample collection and the sample accompanying this document is receivirite. I confirm that, to the best of my knowledge, all statements and representations of this waste material.	I. I certify that I have designated the location point(s) epresentative of the waste that will be shipped to					
Signature T. C. Bucker	Title Edvironmantal Manage					
Name T.C. BRADWAY	Date 09/01/99					

All information submitted on this form and its attachments will be kept confidential within the limits of existing environmental laws and regulations. We suggest that you retain a copy of this form and its attachments for your records.

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 10/06/94 Envirite Waste ID#: CS1762 Sample Collection Date: 08/22/94 Date Analysis Completed: 09/09/94

Waste Description: Soll from Area "A" Closure, non-hazardous

Parameter	Results
pH (TCLF)	10.5 S.U.
Total CN (As Received)	0.55 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barlum	<1.6 mg/L
TCLP Cadmium	<0.14 mg/L
TCLP Chromium	0.60 mg/L
TCLP Lead	<0.64 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	0.70 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP: Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

•

cc: File

FAX	#Pages - 1	From: CHERYL HAWKINS			
TO: TERRY BRADWAY		ENVIRITE CORPORATION			
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238			
FAX#: 216-821-4	568	FAX#: 216-456-2801			

82 853-R4782

PREQUALIFICATION EVALUATION

PARTS WASHER SERVICE

FLUID RECOVERY SERVICES

PAGE 1 OF COMPLETED: 09/09/94

REVISED:

RUN: 09/10/94

ACCEPT FOR SHIPMENT

CONTROL #:

227221-3

BRANCH/SUBMITTER: 404003

LAB #: SAMPLE #:

37868-6 344179

AKRON

OND 981090418

GENERATOR INFORMATION: CUSTOMER NUMBER: 4040-03-9789

AMERICAN STEEL FOUNDRIES 1001 E BROADWAY

ATTN TERRY BRADWAY ALLIANCE, OH 44601

ATTN: TERRY BRADWAY

BRANCH: 404003 - AKRON

GENERAL DESCRIPTION: CARBURATOR CLEANER

NATURE OF BUSINESS: STEEL FOUNDRY

S.I.C.: STATUS: LOG

FACILITY ADDRESS: MANIFEST

1001 E BROADWAY

ATTN TERRY BRADWAY

ALLIANCE, OH 44601

PROCESS DESCRIPTION: OLD OUTDATED MATERIAL

GENERATION AMOUNT: 20 GALLONS ONE TIME ONLY

P.O. #:

DATE SURVEY SIGNED: 08/23/94 TITLE: ENV COORD PHN: 216-823-6150

BILLING ADDRESS:

CONTACT: TERRY BRADWAY CORPORATE REVIEW:

DISPOSITION: ACCEPT FOR SHIP

REVIEW DATE: 09/09/1994

PART NUMBER: 0082102 WASTE, N-SPEC FUEL-55

SAFETY-KLEEN CORP.

3700 LAGRANGE ROAD SMITHFIELD, KY 40068

REVIEWERS: MJK

APPROVED FACILITIES:

SAFETY-KLEEN CORP.

633 E 138TH ST

DOLTON, IL 60419

FED EPA#: ILD980613913

STATE EPA#: 0310690006

TELEPHONE: 7088494850

5028452453

KYD053348108

STATE AUTH: 000162

APPROVED DOT - SHIPPING DESCRIPTION

0001094 DRUM OR BULK

RO HAZARDOUS WASTE, LIQUID, N.O.S.

9 NA3082 PG III (F002)(ERG#31)

US EPA WASTE CODES: F002

D021 D026 D027 D039

USA REVIEW COMMENTS:

* OK FOR HIGH CHLORINE FUEL.

THIS SERVES AS NOTICE PER 40 CFR 264.12(B) THAT EACH FACILITY NOTED ABOVE 'S THE APPROPRIATE PERMITS, IS CAPABLE, HAS CAPACITY AND IS WILLING TO ...CEPT THE MATERIAL AS DESCRIBED IN THE APPROVAL SECTION.

PREQUALIFICATION EVALUATION 81363-R4782 PARTS WASHER SERVICE

PAGE

COMPLETED: 09/09/94

REVISED:

RUN: 09/10/94

ACCEPT FOR SHIPMENT

CONTROL #:

227221-3

BRANCH/SUBMITTER: 404003

FLUID RECOVERY SERVICES

LAB #:

37868-6 344179

SAMPLE #:

GENERAL ANALYSIS OF TOTAL SAMPLE

COLOR : BROWN WATER CONTENT : 1

12.5 WT%

NON-VOLATILE RESIDUE:

12.6 WT% DESCRIPTION: SOLID

FLAMMABILITY

FLAMMABILITY : NO FLASH AT 75 F BY SETAFLASH

: NO FLASH AT 142 F BY SETAFLASH

PH

: DIRECT BY METER 8.7

RADIOACTIVITY : NONE DETECTED

COMMENTS: AQ LAYER IS DK BROWN/EMS = YES

FUEL EVALUATION OF TOTAL SAMPLE

HEAT CONTENT : 10100 BTU/LB ASH UPON COMBUSTION :

F < 0.1 TOTAL CHLORINE CL:

0.5 WT% 27.1 WT%

TOTAL FLUORINE TOTAL BROMINE

BR < 0.1

TOTAL SULFUR

S: 0.2 WT%

GENERAL COMPOSIT	CON: CON	MPOSITION BY		A	PPEARANCE (VOL%)	TOTAL (WT%)
ORGANIC PHASE	(FREE WATER) (FEEDSTOCK) (SEMISOLIDS) (SETTLED SOLIDS).				16.0 0.0	84.0 16.0 0.0 0.0
TOTAL					100.0	100.0
TOTAL PHASE	SPECIFIC GRAVITY:	1.100 VI	SCOSITY	(CENTIPO	SE): <	50 CPS

SPECIFIC COMPOSITION OF TOTAL SAMPLE	COMPOSITION OF:	TOTAL SAMPLE (WT%)	TOTAL SAMPLE (WT%)
WATER CONTENT	CRIPTION: SOLID	12.5 12.6 74.9	12.5 12.6 74.9
TOTAL .		100.0	100.0

PREQUALIFICATION EVALUATION

PAGE 3 OF 3 COMPLETED: 09/09/94

REVISED:

RUN: 09/10/94

ACCEPT FOR SHIPMENT

CONTROL #: 227221-3

LAB #:

37868-6

BRANCH/SUBMITTER: 404003 AKRON

PARTS WASHER SERVICE

FLUID RECOVERY SERVICES

813₁63-R4782

SAMPLE #: 344179

VOLATILE ORGANIC COMPOSITION OF TOTAL SAMPLE BY GAS CHROMATOGRAPHY

SAMPLE PREPARATION METHODS: CS2-EXTRACT

DETECTION METHODS : FID, FID

COMPOUND NAME DICHLOROBENZENE, ORTHO-	ORGANICS	TOTAL SAMPLE (WT%) 29.2
CODE: ODCB CAS NUMBER: 95-50-1 METHYLENE CHLORIDE	15.3	11.5
CODE: MECL CAS NUMBER: 75-09-2		
	15.2	11.4
CODE: PDCB CAS NUMBER: 106-46-7		,
DICHLOROBENZENE, META-	.7.2	5.4
CODE: MDCB CAS NUMBER: 541-73-1		
	026) 6.1	4.6
CODE: CSLS CAS NUMBER: 1319-77-3		
MEDIUM-BOILING ALIPHATIC HYDROCARBONS (C9-C13)	4.5	3.4
CODE: MHC CAS NUMBER: 8030-30-6		
PHENOL	4.3	3.2
CODE: PHL CAS NUMBER: 108-95-2		
XYLENOLS (DIMETHYLPHENOLS, 2,4-, 2,6-, & 3,5-)	3.2	2.4
CODE: XYNS CAS NUMBER: 1300-71-6		
	021) 2.7	.2.0
CODE: MCB CAS NUMBER: 108-90-7		
TOTAL OTHERS (<1.0% EACH)	1.4	1.0
CODE: TO CAS NUMBER:		
	039) 1.1	0.8
CODE: PERC CAS NUMBER: 127-18-4		
TOTAL	100.0	74.9

SPECIFIC ORGANIC COMPOSITION

POLYCHLORINATED BIPHENYLS (PCBS): NONE DETECTED <

LABORATORY REVIEW: A SEG CODE: REVIEWERS: KLT KLT LAB: PREQ NEW CASTLE

RELEASED: 09/08/94 ANALYZED: 09/08/94 SUBMITTED: 08/26/94

THE ANALYSIS CONTAINED HEREIN ARE PERFORMED SOLELY FOR THE PURPOSE OF QUALIFYING THE ANALYZED MATERIALS FOR ACCEPTANCE BY SAFETY-KLEEN CORP. IN ACCORDANCE WITH ITS PERMITS AND PROCESSING CAPABILITY.

NOTICE OF LAND DISPOSAL RESTRICTION OF WASTE IS REQUIRED UNDER 40 CFR PART 268. EPA WASTE CODES FOR LDR: F002 D021 D026 D027 D039

ANALYSIS DOES NOT INDICATE THAT MATERIAL IS CALIFORNIA LIST HALOGENATED ORGANIC OMPOUND WASTE.

J01-F005 COMPOUND CODES FOR LDR NOTICE: MECL PERC MCB ODCB CSLS

8F363-R4782 PREQUALIFICATION EVALUATION REVISED:
PARTS WASHER SERVICE MANIFEST INFORMATION RUN: № 81363-R4782 AMERICAN STEEL FOUNDRIES

RUN: 09/10/94

CONTROL #: 227221-3 SAMPLE #: 344179

REQUIRED MANIFEST FORM: GN

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

UNIFORM HAZARDOUS WASTE MANIFEST	ERATORS US EP.	A NO. DOCUME	NT NO.	2.PAGE 1	UNDE	RLINED AREAS RE REQUIRED
3. GENERATOR NAME AND MA	ILING ADDRESS	l	A. STA	TE MAN	I I FEST	DOCUMENT NO
AMERICAN STEEL FOUNDR 1001 E BROADWAY	IES					
ALLIANCE	OH 44	601	B. STA	ATE GEN	ERATO!	RID
4. GENERATOR PHONE 216	823 6150					
5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	6. US EPA I ILD98490		C. ST TI D. TRANS	-		E <u>2166733340</u>
7. TRANSPORTER 2 CO NAME	8. US EPA I	L L	E. ST TI			E
9. FACILITY NAME AND SIT	E ADDRESS 10	. US EPA ID	NUMBER	G.	FACIL	ITY STATE ID
	40068	KYD05334	8108		502	ITY PHONE 845 2453
11. US DOT DESCRIPTION		-		CONTAI	NER 1	. WASTE NO
A. RO HAZARDOUS WASTE, 9 NA3082 PG III (F00		5.				F002 D021
J. ADDITIONAL DESCRIPTION	N FOR THE MAT	TERIALS LIST	ED ABOV	/E	K. HA	ANDLING CODES
IA) D026 D027 D039						
15. SPECIAL HANDLING INS	STRUCTIONS AND	D ADDITIONAL	INFORM	MOTTAN	<u></u>	

EMERGENCY RESP# 708-888-4660

813@3-R4782 PARTS WASHER SERVICE AMERICAN STEEL FOUNDRIES

PREQUALIFICATION EVALUATION

MANIFEST INFORMATION

RUN: 09/10/94

CONTROL #: SAMPLE #:

227221-3 344179

REQUIRED MANIFEST FORM:

GN

SAFETY-KLEEN CORP. PROVIDES THIS MANIFESTING INFORMATION FOR INSTRUCTIONAL PURPOSES ONLY. ALL THE INFORMATION IS BELIEVED TO BE ACCURATE, BUT IS KNOWN TO BE INCOMPLETE. FEDERAL AND STATE REGULATIONS AND THE INSTRUCTIONS ON THE MANIFEST FORM SHOULD BE CONSULTED FOR COMPLETE INFORMATION. IN ADDITION, CERTAIN VARIATIONS MAY BE ALLOWED BY REGULATIONS, BUT NEED TO BE APPROVED BY A SAFETY-KLEEN REPRESENTATIVE PRIOR TO SHIPMENT.

1. GENER	RATORS US	EPA NO.	DOCUME	NO.	2.PAGE	:	-
JNIFORM HAZARDOUS			ļ		1	UND	ERLINED AREAS
WASTE MANIFEST			1			1	ARE REQUIRED
						ļ	
3. GENERATOR NAME AND MAIL	ING ADDR	ESS		A. ST	ATE MAN	IIFES	T DOCUMENT NO
AMERICAN STEEL FOUNDRIE	ES						
1001 E BROADWAY				1		•	
				ļ			
ALLIANCE	OH	44601		B. ST.	ATE GE	IERAT	OR ID
4. GENERATOR PHONE 216 8	323 6150						,
E IMPANCEODMED 1 CO NAME	6. US EP	A TENNO		Cm m	RANS II		
5. TRANSPORTER 1 CO NAME SAFETY-KLEEN CORP.	1	4908202					ONE 2166733340
SAFETY-RLEEN CORP.	1 1 1 1 2 0	4300202	1	. IKAN	SPURIE	Y PAC	ME 2100/33340
7. TRANSPORTER 2 CO NAME	8. US EP	A ID NO	F	ርጥ ጥ	RANS II	<u> </u>	
7. IKMOTOKTEK Z CO KWEE	0. 05 11	n ib no			SPORTE		ONE
· ·			-		0. 0.(10.		,
9. FACILITY NAME AND SITE	ADDRESS	10. US	EPA ID	NUMBER	G.	FACI	LITY STATE II
					1		
SAFETY-KLEEN CORP.					ļ		
3700 LAGRANGE ROAD		KY	D053348	108	1		
SMITHFIELD KY 40	0068		-		H.	_	ILITY PHONE
		-				<u>5(</u>	02 845 2453
			,		1		T
11. US DOT DESCRIPTION					CONTA	INER	I. WASTE NO
3							
A. DO HAZADDOHC MACTE I	TOILD M	·Λ · C			1		F002
RQ HAZARDOUS WASTE, L 9 NA3082 PG III (F002							D021
3 NA3002 PG 111 (F002). (ERG#31)						<u> </u>
					•		l
J. ADDITIONAL DESCRIPTION	FOR THE	MATERIAL	SLISTE	D ABOV	7E	K. 1	HANDLING CODE
J. ADDITIONAL DESCRIPTION	FOR THE	MATERIAI	LS LISTE	ED ABOV	Æ	K.	HANDLING CODE
J. ADDITIONAL DESCRIPTION 1A) D026 D027 D039	FOR THE	MATERIAI	LS LISTE	ED ABOV	Ë	K.	HANDLING CODE
	FOR THE	MATERI AI	LS LISTE	ED ABOV	É	K. 1	HANDLING CODE
	FOR THE	MATERIAI	LS LISTE	ED ABOV	Έ	K. 1	HANDLING CODE
	FOR THE	MATERIAI	S LISTE	D ABOV	Æ	K. 1	HANDLING CODE

5. SPECIAL HANDLING INSTRUCTIONS AND ADDITIONAL INFORMATION

EMERGENCY RESP# 708-888-4660

ATTACHMENT "C"

ENVIRITE CORPORATION

TECHNOLOGY FOR THE ENVIRONMENT

September 1, 1994

American Steel Foundries 1001 E. Broadway Alliance, Ohio 44601

ATTN: Terry Bradway

Dear Terry:

The soil excavated underneath the EAF dust collector was originally profiled under Envirite approval #CS1744. Upon our analysis, this waste stream is classified as nonhazardous.

Being that this is non-hazardous, and the generation origin is from the EAF dust collector and surrounding areas, County Environmental will accept this waste stream under the WYI1089 profile.

Your pricing will be the same as your non-hazardous EAF dust as well as the scheduling procedure.

Feel free to call me at 216-456-6238 with any questions.

Sincere

TC/dg

cc: Sam Pantuso



WASTE PROFILE INFORMATION F 3M

WASTE STREAM <S-1744



If you need help with this form, please consult your Envirite Technical Marketing Representative or refer to Instructions for Completing Waste Profile Information Form.

The of Generator	14601 tate ZIP tate ZIP ne 214-823-6150
Sirest Street S	14601 tate ZIP tate ZIP ne 214-823-6150
mary Contact	1601 rate ZIP
Title	Ne 314-852-0120
Title	Ne 314-852-0120
Title	
After-hours Phone	ne 216-823-6150
enerator USEPA ID#	515G
Sireer Address for Invoicing	
Ustomer Address for Invoicing	· · · · · · · · · · · · · · · · · · ·
Sineer Sineer Contact Characteristics Contact Phone	
Consider Consider Consider Consider Consider Phone Consider Phone Consider Cons	State ZIP
L. WASTE INFORMATION: Generator's Description/Identification of Waste	
ienerator's Description/Identification of WasteENF	- 62 3-6130
Generator Storage Method — (Check one box.) □ Tank ☒ Roll Off □ Dump Trailer □ Bags □ Drums □ Surface Impoundment □ Does this waste contain flammables? □ Yes ☒ No Comments Does this waste have an obvious odor? □ Yes ☒ No If "yes," describe	cent Free Liquid <u>○</u> sh Point <u>≥ 200</u> °F
☐ Tank ☑ Roll Off ☐ Dump Trailer ☐ Bags ☐ Drums ☐ Surface Impoundment ☐ Does this waste contain flammables? ☐ Yes ☒ No Comments	
Does this waste contain flammables? ☐ Yes ☒ No Comments	
Does this waste have an obvious odor? □ Yes 私 No If "yes," describe	
Does this waste produce any explosive, combustible or toxic gases upon neutralization with lime? — Ye	
	s 🗵 No
Comments:	
Waste Quantity: Estimated Volume 160 403 Estimated Frequency OF 7	ime
SHADED AREA FOR ENVIRITE USE ONLY	
STREAM NUMBER DATE ENTERED STOOL DATE NEEDE	0 8/24/94
TREATMENT FACULTY: Canton X Harvey York TMR CA	0 8/24/19

VL TRÂNSPORTATION INFORMATION:	
Proper DOT Shipping Name 29 HAZARDOUS WI	95TE, SOLID, N.O.S. (BARIUM, CADMIUM
DOT Hazard Class	DOT UN/NA Number NA 3077 PGILL LEAD)
fill the temperature of the waste to be transported ever be greated Comments:	iter than 110°F? Yes Air No
Are special precautions required at the time of pickup?	es & No If "yes," indicate precautions:
Is Envirite handling transportation? Yes No waste, please complete the following information: Transporter Name	
Transporter EPA ID#	State Transporter ID#
Transporter Contact	Phone
After-hours Emergency Contact	Phone
Is this a composite sample? Yes No If "yes," in Identify source of sample (e.g., lagoon, tank, etc.) Please submit sample promptly. within 14 days of sample collection;	
Date of Sampling 8/10/94 Time of Sampling Sampler's Signature 7 Browny Sampler's Name 7 Browny Title and Affiliation of Sampler Fried Resident Table	MANAGER AMERICA, STEEL FOUNDRIES
VIII. CERTIFICATION:	
I hereby avow that any pertinent information that is known disclosed in the information contained herein and attached for sample collection and the sample accompanying this do Envirite. I confirm that, to the best of my knowledge, all starepresentations of this waste material. Signature	to this form. I certify that I have designated the location point(s) cument is representative of the waste that will be shipped to itements and attachments are correct and accurate
Name To CI BRADING Print	Title Environmental Marin

All information submitted on this form and its attachments will be kept confidential within the limits of existing environmental laws and regulations. We suggest that you retain a copy of this form and its attachments for your records.

'V. WASTE CONSTITUENTS:

The waste constituent information may be supplied either on the basis of the generator's knowledge or laboratory analysis. It must be comprehensive, as it will be used to ensure the health and safety of our laboratory personnel and as a comparison to Envirite's analysis of the representative sample submitted. Please address each line entry. Also, note that "TOTAL," not leachable, concentrations are requested below. All unmarked units will be assumed to be mg/kg. If other units are used, please include the proper units with the concentration. If you need help with this section, consult your Envirite Technical Marketing Representative or refer to *Instructions for Completing Waste Profile Information Form.*

METALS	VOLATILE ORGANIC COMPOUNDS
TOTAL CONCENTRATION	TOTAL CONCENTRATION
Aluminum Arsenic Barium Beryllium Boron Cadmium Chromium Chromium (+6) Copper Iron	Acrylonitrile (vinyl cyanide) Benzene Bis(chloromethyl) ether Methylene chloride Methylchlormethyl ether Methyl ethyl ketone Tetrachloroethylene Trichloroethylene Vinyl chloride Carbon tetrachloride
Lead present Manganese usy Mercury Nickel Selenium Silver Tin Zinc	Chloroform Other Other Other SEMI-VOLATILE ORGANIC COMPOUNDS
Other	TOTAL CONCENTRATION 1,2-Diphenylhydrazine 1-Naphthylamine 2-Naphthylamine
TOTAL CONCENTRATION Chloride Sulfate Nitrate Flouride Phosphate CHELATING AGENTS	Anthracene Benzidine Dioxins Ethyleneimine N-Nitrosodimethylamine p-Nitrosodiphenylamine Phenol Other
Ammonia Cyanide Total Cyanide Amenable Cyanide Leachable Other	Other Other Other TOTAL CONCENTRATION Asbestos Scarcinogens Herbicides PCBs Pesticides
	Radioactives Solvents Organometallic Compounds Other Other Other

TIL PROCESS INFORMATION:	
The information provided in this Section will be used by Envirite to veri in detail the process which generates this waste. (Include plating activ metals being plated.) It is important for this information to describe the process that first causes the waste to be regulated as hazardous.	rity [i.e., nickel, chrome, copper], raw solutions and base process that actually generates the waste, namely the
ELECTRIC ARC FURNACE COLLE	CTION AREA HAS BEEN EXCAUATED
THE MATERIAL IS SOME EAF	DUST, SOIL, SAND, LIMESTONE
AND CLAY IN NATURE.	
Are other products used in this area which may contaminate the waste maintenance personnel)? [.] Yes 🖾 No If "yes," identify may available.	
Material:	
Are paint-stripping operations on site? ☐ Yes 🖾 No	
Are cyanide-plating operations on site? ☐ Yes ☑ No	
IV. HAZARDS INFORMATION:	
Is the waste a RCRA Hazardous Waste as described per 40 CFR 265 Please identify all EPA Hazardous-Waste Numbers which apply to the specified below. In the blank space(s) provided, please specify any (continuous).	e waste by placing an "X" in the box next to the codes
Characteristic Hazardous Wastes	Listed Hazardous Wastes
□ D001 (Oxidizers) □ D007 (Chromium) □ D002 (Corrosive) ☑ D008 (Lead) □ D003 (Reactive) □ D009 (Mercury) □ D004 (Arsenic) □ D010 (Selenium) ☒ D005 (Barium) □ D011 (Silver) ☒ D006 (Cadmium) □ Other	☐ F006 ☐ K002 ☐ K007 ☐ F007 ☐ K003 ☐ K008 ☐ F008 ☐ K004 ☐ K062 ☐ F009 ☐ K005 ☐ F011 ☐ K006 ☐ F012 ☐ F019 ☐ Other
Does the waste contain free liquid?* ☐ Yes ☒ No	
Is the waste subject to Land Disposal Restrictions (LDR) per 40 CFF	R 268 or its equivalent state regulations? 🔀 Yes 🔲 No
Does this waste require treatment to conform to Land Disposal Rest	, ,
Per the LDR program's definition, the waste is a: Wastewater	
Has EP Toxicity, TCLP or any other testing been done?	
Does the liquid portion of the RCRA Hazardous Waste contain nicke	I ≥ 134 mg/I?
Does the liquid portion of the RCRA Hazardous Waste contain thalli	um≥130 mg/l? kt√No □ Yes Specifymg/l
If the waste is not a RCRA Hazardous Waste as described by federa state from which it is being shipped? Yes No No	al or state regulation, is it regulated as a "special waste" in the ot Applicable Please provide applicable codes.
* As determined by Method 9095 (Paint Filter Liquids Test) describe Physical/Chemical Methods.** (EPA Publication No. SW-846, 2nd ed	dition)
f "Wastewaters" are wastes that contain less than 1% total organic (Nonfilterable Residues Test — Method No. 160.2 Methods for Che March 1983).	carbon (TOC) and less that 1% total suspended solids mical Analysis of Water and Wastes, EPA — 600/4-79-020,
"Nonwastewaters" are those wastes that do not meet the definition	on of "Wastewaters."

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E. Broadway Street Alliance, Ohlo 44601

Report Date: 10/06/94 Envirite Waste ID#: CS1744 Sample Collection Date: 08/10/94 Date Analysis Completed: 08/15/94

Waste Description: EAF dust collector closure material

<u>Parameter</u>	<u>Results</u>
pH (TCLP)	9.14 S.U.
Total CN (As Received)	0.53 mg/kg
TCLP Arsenic	<0.0077 mg/L
TCLP Barium	<1.6 mg/L
TCLP Cadmium	0.30 mg/L
TCLP Chromlum	<0.10 mg/L
TCLP Lead	0.32 mg/L
TCLP Mercury	<0.0008 mg/L
TCLP Nickel	<0.30 mg/L
TCLP Selenium	<0.0080 mg/L
TCLP Silver	<0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirtie facilities. Envirtie makes no representation or warranty, express or implied, as to the suitability of this energies for any other use.

Analysis Approved by:

CC: TSR: tme

FAX #Pages - 1		From: CHERYL HAWKINS			
TO: TERRY BRADWAY		ENVIRITE CORPORATION			
CO: AMERICAN STEEL FOUND.		Phone: 216-456-6238			
FAX#: 216-821-4568		FAX#: 216-456-2801			



ANALYTICAL REPORT

TERRY BRADWAY

AMERICAN STEEL FOUNDRIES

QUANTERRA INCORPORATED

Alesia M. Danford

Project Manager

August 25, 1994

PROJECT NARRATIVE

The following report contains the analytical results for thirteen solid samples and one water sample submitted to Quanterra-North Canton by American Steel Foundries. The samples were received August 15, 1994, according to documented sample acceptance procedures.

Quanterra-North Canton utilizes only USEPA approved methods and instrumentation in all analytical work. The samples presented in this report were analyzed for the parameters listed on the following page in accordance with the methods indicated. A summary of QC data for these analyses is included at the end of the report.

Results were provided by facsimile transmission to Terry Bradway at American Steel Foundries on August 23, 1994.

ANALYTICAL METHODS SUMMARY

Parameters Parameters	Methods			
TCLP Extraction	SW846 1311			
Silver	SW846 6010			
Arsenic	SW846 6010			
Barium	SW846 6010			
Cadmium	SW846 6010			
Chromium	SW846 6010			
Lead	SW846 6010			
Selenium	SW846 6010			
Mercury	SW846 7470			
Mercury	SW846 7471			

References:

SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, September, 1986 and it's updates.

SAMPLE SUMMARY

The analytical results of the samples listed below are presented on the following pages.

<u>WO #</u>	LABORATORY ID	SAMPLE IDENTIFICATION
Q4898	A4H150038-001	BOX #116 BAGHOUSE-SOUTH 8-2-94 10:00AM
Q4899	A4H150038-002	BOX #111 BAGHOUSE 8-2-94 11:50AM
Q4900	A4H150038-003	BOX #135 BAGHOUSE-CENTRAL 8-3-94 8:00AM
Q4901	A4H150038-004	BOX #110 BAGHOUSE-CENTRAL 8-3-94 9:10AM
Q4902	A4H150038-005	BFI #1 BAGHOUSE-NORTH 8-3-94 2:00PM
Q4903	A4H150038-006	BFI #2 BAGHOUSE-ONLY 8-3-94 3:20PM
Q4904	A4H150038-007	BFI #3 BAGHOUSE-NORTH 8-4-94 7:30AM
Q4905	A4H150038-008	BFI #4 BAGHOUSE-CENTRAL 8-8-94 7:30AM
Q4906	A4H150038-009	BIN #128 BAGHOUSE-NORTH 8-8-94 11:00AM
Q4907	A4H150038-010	BIN #137 BAGHOUSE-NORTH 8-8-94 11:30AM
Q4909	A4H150038-011	#6002Y03 BAGHOUSE-NORTH 8-8-94 3:10PM
Q4910	A4H150038-012	BIN #378 BAGHOUSE-NORTH 8-9-94 8:15PM
Q4912	A4H150038-013	BIN #2510 BAGHOUSE-NORTH 8-9-94 10:00AM
Q4915	A4H150038-014	081394 DECON WATER 8-13-94 8:00AM

BOX #116 BAGHOUSE-SOUTH 8-2-94 10:00AM

WO #: Q4898

MATRIX: SOLID

DATE SAMPLED:

8/02/94

LAB #: A4H150038-001

DATE RECEIVED:

8/15/94

TCLP EXTRACTION DATE:

8/19/94

FINAL PH:6.4

- - - RCRA METALS - - - -

PARAMETER	RESULT	REPORTING LIMIT	UNIT	METHOD	PREPARATION - ANALYSIS DATE	QC <u>BATCH</u>
TCLP META	LS					
Silver	ND	0.10	mg/L	SW846 6010	8/22/94	4234028
Arsenic	ND	0.50	mg/L	SW846 6010	8/22/94	4234028
Barium	1.0	1.0.	mg/L	SW846 6010	8/22/94	4234028
Cadmium	0.20	0.10	mg/L	SW846 6010	8/22/94	4234028
Chromium	ND .	0.10	mg/L	SW846 6010	8/22/94	4234028
Lead	0.59	0.10	mg/L	SW846 6010	8/22/94	4234028
Selenium	ND	0.30	mg/L	SW846 6010	8/22/94	4234028
Mercury	ND	0.020	mg/L	SW846 7471	8/22- 8/23/94	4234028

BOX #111 BAGHOUSE 8-2-94 11:50AM

WO #: Q4899

LAB #: A4H150038-002

MATRIX: SOLID

DATE SAMPLED:

8/02/94

DATE RECEIVED:

8/15/94

TCLP EXTRACTION DATE:

8/19/94

FINAL PH:5.7

- - - - - - - - - - - - - - - - RCRA METALS - - - -

| PARAMETER | RESULT | REPORTING
LIMIT | <u>UNIT</u> | <u>METHOD</u> | PREPARATION -
ANALYSIS DATE | QC
<u>BATCH</u> |
|-------------|--------|--------------------|-------------|---------------|--------------------------------|--------------------|
| TCLP METALS | ; | | | | | |
| Silver | ND . | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Barium | ND | 1.0 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Cadmium | 0.13 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Lead | 3.0 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Selenium | ND | 0.30 | mg/L | SW846 6010 | 8/22-8/23/94 | 4234028 |
| Mercury | ND | 0.020 | mg/L | SW846 7471 | 8/22- 8/23/94 | 4234028 |
| | | | | | | |

BOX #135 BAGHOUSE-CENTRAL 8-3-94 8:00AM

WO #: Q4900

DATE SAMPLED:

8/03/94

LAB #: A4H150038-003 MATRIX: SOLID

DATE RECEIVED: 8/15/94 TCLP EXTRACTION DATE:

8/19/94

FINAL PH:6 4

| PARAMETER | RESULT | REPORTING
LIMIT | TINU | METHOD | PREPARATION -
ANALYSIS DATE | QC
<u>BATCH</u> |
|-------------|--------|--------------------|------|------------|--------------------------------|--------------------|
| TCLP METALS | S | | | | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Barium | 1.2 | 1.0 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Cadmium | 0.16 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Lead | 0.26 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Selenium | ND | 0.30 | mg/L | SW846 6010 | 8/22-8/23/94 | 4234028 |
| Mercury | ND | 0.020 | mg/L | SW846 7471 | 8/22- 8/23/94 | 4234028 |

BOX #110 BAGHOUSE-CENTRAL 8-3-94 9:10AM

WO #: Q4901

DATE SAMPLED:

8/03/94

LAB #: A4H150038-004

DATE RECEIVED:

FINAL PH:6.4

8/15/94

MATRIX: SOLID

TCLP EXTRACTION DATE:

8/19/94

| PARAMETER | RESULT | REPORTING
LIMIT | <u>UNIT</u> | METHOD | PREPARATION -
ANALYSIS DATE | QC
<u>BATCH</u> |
|-------------|--------|--------------------|-------------|------------|--------------------------------|--------------------|
| TCLP METALS | ; | | | | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Barium | 1.4 | 1.0 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Cadmium | ND | 0.10 | mq/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Lead | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Selenium | ND | 0.30 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Mercury | ND | 0.020 | mg/L | SW846 7471 | 8/22- 8/23/94 | 4234028 |

BFI #1 BAGHOUSE-NORTH 8-3-94 2:00PM

WO #: Q4902

DATE SAMPLED:

FINAL PH:6.7

8/03/94

LAB #: A4H150038-005

DATE RECEIVED:

8/15/94

MATRIX: SOLID

TCLP EXTRACTION DATE:

8/19/94

| PARAMETER | RESULT | REPORTING LIMIT | <u>UNIT</u> | METHOD | PREPARATION -
ANALYSIS DATE | QC
<u>BATCH</u> |
|-------------|--------|-----------------|-------------|------------|--------------------------------|--------------------|
| TCLP METALS | | | | | • | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Barium | ND. | 1.0 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Cadmium | 0.18 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Lead | 0.16 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Selenium | ND | 0.30 | mg/L | SW846 6010 | 8/22-8/23/94 | 4234028 |
| Mercury | ND | 0.020 | mg/L | SW846 7471 | 8/22- 8/23/94 | 4234028 |

BFI #2 BAGHOUSE-ONLY 8-3-94 3:20PM

WO #: Q4903

LAB #: A4H150038-006

MATRIX: SOLID

DATE RECEIVED: 8/15/94 TCLP EXTRACTION DATE:

DATE SAMPLED:

8/19/94

8/03/94

FINAL PH:6.6

| PARAMETER | RESULT | REPORTING LIMIT | <u>UNIT</u> | METHOD | PREPARATION -
ANALYSIS DATE | QC
<u>BATCH</u> |
|-------------|--------|-----------------|-------------|------------|--------------------------------|--------------------|
| TCLP METALS | | | | • | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Barium | 1.1 | 1.0 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Cadmium | 0.12 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Lead | 0.19 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Selenium | ND . | 0.30 | mg/L | SW846 6010 | 8/22-8/23/94 | 4234028 |
| Mercury | ND | 0.020 | mg/L | SW846 7471 | 8/22- 8/23/94 | 4234028 |

BFI #3 BAGHOUSE-NORTH 8-4-94 7:30AM

WO #: Q4904

DATE SAMPLED:

8/04/94

LAB #: A4H150038-007

DATE RECEIVED:

8/15/94

MATRIX: SOLID

TCLP EXTRACTION DATE:

8/19/94

- - - - - - - - - - - - RCRA METALS - -

FINAL PH:6.7

| RATION - QC
SIS DATE BATCH |
|-------------------------------|
| |
| 8/23/94 4234028 |
| 8/23/94 4234028 |
| 8/23/94 4234028 |
| 8/23/94 4234028 |
| 8/23/94 4234028 |
| 8/23/94 4234028 |
|
8/23/94 4234028 |
| 8/23/94 4234028 |
| 3 |

BFI #4 BAGHOUSE-CENTRAL 8-8-94 7:30AM

WO #: Q4905

DATE SAMPLED:

8/08/94

LAB #: A4H150038-008

DATE RECEIVED:

8/15/94

MATRIX: SOLID

TCLP EXTRACTION DATE:

FINAL PH:6.6

8/19/94

- - - - - - - - - - - - - - - RCRA METALS - - -

| PARAMETER | RESULT | REPORTING LIMIT | <u>UNIT</u> | <u>METHOD</u> | PREPARATION - ANALYSIS DATE | QC
<u>BATCH</u> |
|-------------|--------|-----------------|-------------|---------------|-----------------------------|--------------------|
| TCLP METALS | | | | | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Barium | ND | 1.0 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Cadmium | 0.26 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Lead | 0.21 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Selenium | ND | 0.30 | mg/L | SW846 6010 | 8/22-8/23/94 | 4234028 |
| Mercury | ND . | 0.020 | mg/L | SW846 7471 | 8/22- 8/23/94 | 4234028 |

BIN #128 BAGHOUSE-NORTH 8-8-94 11:00AM

WO #: Q4906

DATE SAMPLED:

8/08/94

LAB #: A4H150038-009 MATRIX: SOLID

DATE RECEIVED: TCLP EXTRACTION DATE:

8/15/94

FINAL PH:6.5

8/19/94

- - - - - - - - - - - - - - - - RCRA METALS - - - -

| PARAMETER | RESULT | REPORTING
LIMIT | TINU | <u>METHOD</u> | PREPARATION -
ANALYSIS DATE | QC
<u>BATCH</u> |
|-------------|--------|--------------------|------|---------------|--------------------------------|--------------------|
| TCLP METALS | | | | | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Barium | ND | 1.0 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Cadmium | ND | 0.10 | mq/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Lead | 0.12 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Selenium | ND | 0.30 | mg/L | SW846 6010 | 8/22-8/23/94 | 4234028 |
| Mercury | ND | 0.020 | mg/L | SW846 7471 | 8/22- 8/23/94 | 4234028 |
| | | | | | | |

BIN #137 BAGHOUSE-NORTH 8-8-94 11:30AM

WO #: Q4907

LAB #: A4H150038-010

MATRIX: SOLID

DATE SAMPLED:

8/08/94

DATE RECEIVED:

8/15/94

TCLP EXTRACTION DATE:

8/19/94

FINAL PH:6.4

----- RCRA METALS --

| PARAMETER | RESULT | REPORTIN
LIMIT | IG
<u>UNIT</u> | METHOD | PREPARATION -
ANALYSIS DATE | QC
<u>BATCH</u> |
|-------------|--------|-------------------|-------------------|------------|--------------------------------|--------------------|
| TCLP METALS | S | | | | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Barium | 1.0 | 1.0 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Cadmium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Lead | ND - | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Selenium | ND | 0.30 | mg/L | SW846 6010 | 8/22-8/23/94 | 4234028 |
| Mercury | ND | 0.020 | mg/L | SW846 7471 | 8/22- 8/23/94 | 4234028 |

#6002Y03 BAGHOUSE-NORTH 8-8-94 3:10PM

WO #: Q4909

DATE SAMPLED:

8/08/94

LAB #: A4H150038-011 MATRIX: SOLID DATE RECEIVED:

8/15/94

TCLP EXTRACTION DATE:

FINAL PH:6.4

8/19/94

- - - - - - - - - - - - - RCRA METALS - - -

| <u>PARAMETER</u> | RESULT | REPORTING
LIMIT | UNIT | METHOD | PREPARATION - ANALYSIS DATE | QC
<u>BATCH</u> |
|------------------|--------|--------------------|------|------------|-----------------------------|--------------------|
| TCLP METALS | | | | | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Barium | 1.0 | 1.0 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Cadmium | 0.13 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Lead | 0.14 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Selenium | ND | 0.30 | mg/L | SW846 6010 | 8/22-8/23/94 | 4234028 |
| Mercury | ND | 0.020 | mg/L | SW846 7471 | 8/22- 8/23/94 | 4234028 |

BIN #378 BAGHOUSE-NORTH 8-9-94 8:15PM

WO #: Q4910

DATE SAMPLED:

8/09/94

LAB #: A4H150038-012

DATE RECEIVED:

8/15/94

MATRIX: SOLID

TCLP EXTRACTION DATE:

8/19/94

FINAL PH:6.5

| PARAMETER | RESULT | REPORTING LIMIT | TINU | METHOD | PREPARATION -
ANALYSIS DATE | QC
BATCH |
|-------------|--------|-----------------|------|------------|--------------------------------|-------------|
| TCLP METALS | ; | | | | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Barium | ND | 1.0 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Cadmium | 0.10 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Lead | 0.11 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Selenium | ND | 0.30 | mg/L | SW846 6010 | 8/22-8/23/94 | 4234028 |
| Mercury | ND · | 0.020 | mg/L | SW846 7471 | 8/22- 8/23/94 | 4234028 |
| | | | | | | |

BIN #2510 BAGHOUSE-NORTH 8-9-94 10:00AM

WO #: Q4912

DATE SAMPLED:

8/09/94

LAB #: A4H150038-013

DATE RECEIVED:

8/15/94

MATRIX: SOLID

TCLP EXTRACTION DATE:

8/19/94

FINAL PH:6.5

| PARAMETER | RESULT | REPORTING
LIMIT | UNIT | METHOD | PREPARATION -
ANALYSIS DATE | QC
<u>BATCH</u> |
|-------------|--------|--------------------|------|---|--------------------------------|--------------------|
| TCLP METALS | | - | | | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Barium | 1.1 | 1.0 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Cadmium | 0.11 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Lead | 0.10 | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Selenium | ND | 0.30 | mg/L | SW846 6010 | 8/22-8/23/94 | 4234028 |
| Mercury | ND · | 0.020 | mg/L | SW846 7471 | 8/22- 8/23/94 | 4234028 |
| | | | | t contract to the contract to | | |

081394 DECON WATER 8-13-94 8:00AM

WO #: 04915

LAB #: A4H150038-014

DATE SAMPLED:

8/13/94

MATRIX: WATER

DATE RECEIVED:

8/15/94

TCLP EXTRACTION DATE:

8/19/94

FINAL PH:7.0

- - - - - RCRA METALS -

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986)

| <u>PARAMETER</u> | RESULT | REPORTING
LIMIT | UNIT | METHOD | PREPARATION -
ANALYSIS DATE | QC
<u>BATCH</u> |
|------------------|--------|--------------------|--------------|------------|--------------------------------|--------------------|
| TCLP METALS | S | | | | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Barium | ND | 1.0 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Cadmium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Lead | ND | 0.10 | mg/L | SW846 6010 | 8/22- 8/23/94 | 4234028 |
| Selenium | ИD | 0.30 | mg/L | SW846 6010 | 8/22-8/23/94 | 4234028 |
| Mercury | ND | 0.020 | mg/L | SW846 7470 | 8/22- 8/23/94 | 4234028 |
| = | | | - | | | |

WATER BOES NOT GO TO THE LANDFILL VCB 8/29/84

NOTE: AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT

QUALITY CONTROL SECTION

QUALITY CONTROL NARRATIVE

The results included in this report have been reviewed for compliance with the laboratory QA/QC plan. All data have been found to be compliant with laboratory protocol.

CHECK SAMPLE REPORT

LAB #: A4H150038

*** TCLP ***

TCLP EXTRACTION DATE: 8/19/94

| METALS |
|--------|
| |

| | SPIKE | | |
|----------|----------------|----------|---------------|
| | PERCENT | Q/C | PREPARATION - |
| COMPOUND | RECOVERY | LIMITS | ANALYSIS DATE |
| | BATCH:4234028 | | |
| Silver | 102 | (50~150) | 8/22/94 |
| Arsenic | 102 | (50-150) | 8/22/94 |
| Barium | 96 | (50-150) | 8/22/94 |
| Cadmium | 100 | (50-150) | 8/22/94 |
| Chromium | 101 | (50-150) | 8/22/94 |
| Mercury | 89 | (50-150) | 8/22- 8/23/94 |
| Lead | 97 | (50-150) | 8/22/94 |
| Selenium | . 109 | (50-150) | 8/22/94 |
| | BATCH: 4234028 | | • |
| Silver | 102 | (50-150) | 8/22/94 |
| Arsenic | 102 | (50-150) | 8/22/94 |
| Barium | 96 | (50-150) | 8/22/94 |
| Cadmium | 100 | (50-150) | 8/22/94 |
| Chromium | 101 | (50-150) | 8/22/94 |
| Mercury | 89 | (50-150) | 8/22- 8/23/94 |
| Lead | 97 | (50-150) | 8/22/94 |
| Selenium | 109 | (50-150) | 8/22/94 |

INTRA-LAB BLANK REPORT

LAB #: A4H150038

*** TCLP ***

TCLP EXTRACTION DATE: 8/19/94

METALS

| PARAMETER | RESULT | REPORTINGLIMIT | <u>UNIT</u> . | METHOD | PREPARATION -
ANALYSIS DATE |
|--------------------------------|----------------|-----------------------|---------------|--|-------------------------------------|
| | | BATCH: 4234 | 1028 | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 8/22/94 |
| Arsenic | ИD | 0.50 | mg/L | SW846 6010 | 8/22/94 |
| Barium | ND | 1.0 | mg/L | SW846 6010 | 8/22/94 |
| Cadmium
Chromium
Mercury | ND
ND
ND | 0.10
0.10
0.020 | mg/L
mg/L | SW846 6010
SW846 6010
SW846 7470 | 8/22/94
8/22/94
8/22- 8/23/94 |
| Mercury
Lead
Selenium | ND
ND
ND | 0.020
0.10
0.30 | mg/L
mg/L | SW846 7471
SW846 6010
SW846 6010 | 8/22- 8/23/94
8/22/94
8/22/94 |

NOTE:

ND NOT DETECTED AT THE STATED REPORTING LIMIT

MATRIX SPIKE REPORT

LAB #: A4H150038-001

*** TCLP ***

TCLP EXTRACTION DATE: 8/19/94

METALS

| COMPOUND | SPIKE
PERCENT
RECOVERY | SPIKE/DUP
PERCENT
RECOVERY | Q/C
LIMITS | RPD | RPD
LIMITS | PREPARATION -
ANALYSIS DATE |
|----------|------------------------------|----------------------------------|---------------|------|---------------|--------------------------------|
| | BATC | H:4234028 M | ATRIX: SOLID | | | |
| Silver | 106 | 103 | (50-150) | 2.4 | (0-20) | 8/22/94 |
| Arsenic | 105 | 105 | (50-150) | 0.28 | (0-20) | 8/22/94 |
| Barium | 101 | 101 | (50-150) | 0.49 | (0-20) | 8/22/94 |
| Cadmium | 95 | 100 | (50-150) | 5.1 | (0-20) | 8/22/94 |
| Chromium | 102 | 101 | (50-150) | 0.78 | (0-20) | 8/22/94 |
| Mercury | 89 | 104 | (50-150) | 16 | (0-20) | 8/22/94 |
| Lead | 92 | 98 | (50-150) | 6.5 | (0-20) | 8/22/94 |
| Selenium | 112 | 118 | (50-150) | 4.9 | (0-20) | 8/22/94 |

PURCHAGE ORDER A-27859

WADSWORTH/ALERT Laboratories

| CLIENT CODE |
|--------------------|
| QUOTE / SAR NUMBER |

Division of Enseco Incorporated 4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720 (216) 497-9396 FAX (216) 497-0772

Nº 29816

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Chain-of Custod | dy Record | | (21) | 6) 497-9396 | · | | 772 | | | | 14- 73010 |
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WADSWORTH/ALERT Laboratories

| CLIENT CODE | |
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| OUOTE / SAR NUMBER | |

Division of Enseco Incorporated
4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720
(216) 497-9396 FAX (216) 497-0772

Nº 29816

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American Steel Found 1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823

FAX NO. (216) 821-4568

JUL

JOHN OESCH PLANT MANAGER

July 01, 1994

OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

CERTIFIED LETTER RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, HRE-8J

P 482 673 315

U.S. EPA, Region V 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Barbara Mazur

Chief, SWERB Section V Office of Regional Counsel U.S. EPA Region V, 5CS-TUB3 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Richard Clarizio P 482 673 316

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

Progress Report # 9

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

ALLIANCE FACILITY TREATMENT, STORAGE AND DISPOSAL C. REQUIREMENTS

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

RMT Engineering & Environmental Management performed the additional required background sampling on August 30,1993.

On November 08, 1993, American Steel Foundries submitted a Background Sampling Analysis Plan for the Electric Furnace Baghouse Management Unit to the OEPA.

In a letter dated December 21, 1993, Mr. John Palmer, Environmental Specialist, OEPA, Northeast District Office instructed Mr. Terry Bradway, Environmental Manager, American Steel Foundries to apply for an extension to the (180) day limit requirement of the consent order because the Ohio EPA needed more time to complete their technical review of the Background Sampling Plan for the Electric Arc Furnace Baghouse Management Unit.

In a January 11, 1994 letter, ASF formally requested an extension to the closure limit of the Electric Arc Furnace Baghouse Closure Plan in accordance with the OEPA's directive.

The Ohio EPA granted the extension request on February 03, 1994 in Mr.Donald R. Schregardus's letter to Mr. Terry Bradway.

In a May 09, 1994 letter, Mr. Palmer listed OEPA's technical comments for the document titled Background Sampling and Analysis for Electric Arc Furnace Baghouse Hazardous Waste Management Unit.

Mr. John F. Oesch, Plant Manager, American Steel Foundries formally submitted his response to Mr. Palmer's technical comments in a June 10, 1994 letter.

Mr. Palmer acknowledged receipt of the June 10, 1994 response to comments in his June 15, 1994 letter.

We plan to close the Electric Arc Furnace Baghouse Waste Management Unit during our plant vacation shutdown in the first two weeks of August. However, we are currently awaiting Ohio EPA approval regarding our response to comments of June 10, 1994.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

- 1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."
- 3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.

- 4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.
- 5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.
- 6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

RMT Engineering and Environmental Management completed the first sampling of the landfill wells in accordance with the Groundwater Quality Assessment Plan during the week of December 13, 1993 and on February 23, 1994 results of the sampling were submitted to the U.S. EPA and Ohio EPA with our recommendations for parameters for the next three sampling events in accordance with the Consent Decree.

In a March 08, 1994 letter to Mr. Terry Bradway, Mr. John Palmer of the Ohio EPA acknowledged receipt of the test results.

Mr. John Palmer of the Ohio EPA approved our recommendations for the groundwater sampling parameters in a letter dated March 11, 1994.

Mr. Palmer's letter of March 11, 1994 also listed several additional comments relative to the groundwater monitoring program at the Sebring Facility.

In Mr. J.F.Oesch's letter of April 01, 1994, ASF responded to Mr. Palmer's March 11, 1994 comments.

In an April 29, 1994 letter, Mr. John Palmer agreed that ASF's response of April 01,1994 had adequately addressed all issues of concern to the agency.

A third sampling of the groundwater monitoring wells was performed during the week of June 13,1994. Those results have not been received to date.

RMT will be performing the fourth sampling of the monitoring wells the week of September 12, 1994.

TEST RESULTS AND SAMPLING SUMMARY

Our experiments to reduce lead and cadmium in EAF dust continue.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period. Our scrap mixture was changed in January of 1994 to include the addition of 10% obsolete plate. Its impact on our furnace operation is being evaluated.

American Waste and BFI have also sampled several waste streams during the previous period and test results have been received. See attachment "B"

Envirite Corp. is in process of recertification of our EAF Dust and Smoke Eater waste streams but retest results have not been received to date.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

J. F. Oesch PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW

JW

DJM

RML

RBR

Ohio EPA P 482 673 317

Chief, Division of Solid and Hazardous Waste

1800 WaterMark Drive

P.O. Box 1049

Columbus, Ohio 43268-0149

Ohio EPA P 482 673 318

Division of Solid and Hazardous Waste

Northeast District Office 2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Ohio EPA \$P\$ 482 673 319 Supervisor, division of Solid and Infectious Waste Management Northeast District Office

P 482 673 320

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.

Amsted Industries, Inc.

44th Floor - Boulevard Towers South

205 N. Michigan Ave.

Chicago, Illinois 60601

P. C. Schillawski

Squire Sanders & Dempsey

4900 Society Center

127 Public Square

Cleveland, Ohio 44114-1304

Mahoning County Health District

Chief, Solid Waste Program

2801 Market Street

Youngstown, Ohio 44507-1649

Attn: R.D.Setty

C:\WP51\HAZWASTE\USVAMSTE.TB9

ATTACH MENT

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries T.C. Bradway 1001 E. Broadway Alliance, OH 44601

Report Date: 03/18/94

Envirite Waste ID#: CS1373

Waste Description: EAF Furnace dust

Sample Collection Date: 03/01/94 Date Analysis Completed: 03/14/94

| Parameter | Results |
|------------------------|--------------|
| pH (As Received) | 9.0 S.U. |
| Total CN (As Received) | 0.50 mg/kg |
| TCLP Arsenic | <0.0077 |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium | 2.8 mg/L |
| TCLP Chromium | <0.10 mg/L |
| TCLP Lead | 12.5 mg/L |
| TCLP Mercury | <0.0008 mg/L |
| TCLP Nickel | <0.30 mg/L |
| TCLP Selenium | <0.0080 mg/L |
| TCLP Silver | <0.041 mg/L |

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

QA/RC Coordinator

CC:

File

TSR

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries T.C. Bradway 1001 E. Broadway Alliance, OH 44601

Report Date: 03/18/94

Envirite Waste ID#: CS1373

Waste Description: EAF Furnace dust

Sample Collection Date: 03/08/94 Date Analysis Completed: 03/15/94

| <u>Parameter</u> | <u>Results</u> |
|------------------------|----------------|
| pH (As Received) | 9.0 S.U. |
| Total CN (As Received) | 1.0 mg/kg |
| TCLP Arsenic | <0.0077 |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium | 3.1 mg/L |
| TCLP Chromium | <0.10 mg/L |
| TCLP Lead | 9.8 mg/L |
| TCLP Mercury | <0.0008 mg/L |
| TCLP Nickel | 0.38 mg/L |
| TCLP Selenium | <0.0080 mg/L |
| TCLP Silver | <0.082 mg/L |

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

CC:

File

TSR

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries Mr Terry Bradway 1001 E. Broadway St. Alliance, Ohio 44601

Report Date: 03/31/94

Envirite Waste ID#: CS1373

Waste Description: EAF Furnace dust

Sample Collection Date: 03/22/94 Date Analysis Completed: 03/30/94

| | • |
|------------------------|--------------|
| Parameter | Results |
| pH (TCLP) | 5.9 S.U |
| Total CN (As Received) | 0.50 mg/kg |
| TCLP Arsenic | 0.11 mg/L |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium | 3.0 mg/L |
| TCLP Chromium | <0.10 mg/L |
| TCLP Lead | 3.4 mg/L |
| TCLP Mercury | <0.008 mg/L |
| TCLP Nickel | 0.48 mg/L |
| TCLP Selenium | <0.0080 mg/L |
| | |

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express of implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

TCLP Silver

Must ynoghukens

<0.082 mg/L

cc: File

| FAX 373/94 PAGES | CHERIL HANKINS |
|--------------------|-----------------|
| TERKI BLAOWAU | ENVIRITE-CANTON |
| a Am. Steel Pours. | PH 216-456-6233 |
| FAX 8214568 | 216-456-2801 |

FIANTKTIE - CHIJION LHV#5104005007

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries

1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 04/15/94

Envirite Waste ID#: CS1373

Sample Collection Date: 04/06/94 Date Analysis Completed: 04/13/94

Waste Description: EAF Furnace Dust

| Parameter | Results |
|------------------------|--------------|
| pH (TCLP) | 6.6 S. U. |
| Total CN (As Received) | 0.56 mg/kg |
| TCLP Arsenic | <0.0077 mg/L |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium | 1.6 mg/L |
| TCLP Chromium | 0.14 mg/L |
| TCLP Lead | 8.3 mg/L |
| TCLP Mercury | <0.0008 mg/L |
| TCLP Nickel | <0.30 mg/L |
| TCLP Selenium | <0.0080 mg/L |
| TCLP Silver | <0.082 mg/L |

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

QA/RC Coordinator

CC:

File

FAX HIS 194 1 CHEELL HAWKING
TO BEEL BLAD OF BURNIE CANTON
AMER SOLI FOR SO

CERTIFICATION ANALYSIS REPORT

American Steel Foundries 1001 E Broadway Street

Alliance, Ohio 44601

Report Date: 050054/15/94 Envirite Waste ID#: CS1373

Waste Description: EAF Furnace Dust

Sample Collection Date: 04/2606/94 Date Analysis Completed: 05/04/94

<0.082 mg/L

Box#: 150

| Parameter | Results |
|------------------------|--------------|
| pH (TCLP) | 6.6 S.U. |
| Total CN (As Received) | 0.55 mg/kg |
| TCLP Arsenic | <0.0077 mg/L |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium: | 1.7 mg/L |
| TCLP Chromium | 0.10 mg/L |
| TCLP Lead | 9.3 mg/L |
| TCLP Mercury | <0.0008 mg/L |
| TCLP Nickel | <0.30 mg/L |
| TCLP Selenium | <0.0080 mg/L |

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

TCLP Silver

cc: File TSR: tmc

| FAX | #Pages - 1 | From: CHERYL HAWKINS | | |
|---------------------------|------------|----------------------|--|--|
| TO: TERRY BRADWAY | | ENVIRITE CORPORATION | | |
| CO: AMERICAN STEEL FOUND. | | Phone: 216-456-6238 | | |
| FAX#: 216-8 | 32-4568 | FAX#: 216-456-2801 | | |

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

Generator Name: Generator Address:

Generator City, State, Zip:

American Steel Foundries 1001 E. Broadway Street Alliance, OH 44601

Report Date:

06/07/94 Envirite Waste ID: CS1373 Sample Collection Date: 06/01/94 Date Analysis Completed: 06/06/94

Waste Description: EAF Furnace Dust

BOX #- 111

| Parameter | Results |
|------------------------|---------------------|
| pH (TCLP) | 6.4 |
| Total CN (AS Received) | 1.1 mg/kg |
| TCLP Arsenic | <0.15 mg/L |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium | 5.2 mg/L |
| TCLP Chromium | <0.10 mg/L |
| TCLP Lead | 7.0 mg/L |
| TCLP Mercury | <0.0008 mg/L |
| TCLP Nickel | <0.30 mg/L |
| TCLP Selenium | <0.16 mg/L |
| TCLP Silver | <0.082 mg/ <u>L</u> |
| | |

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

CC:

File

TSR tmc

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries

1001 E. Broadway Street Alliance, Ohio 44601

Report Date: 05/24/94

Envirite Waste ID#: CS1373

Sample Collection Date: 05/12/94

Date Analysis Completed: 05/17/94

Waste Description: EAF Furnace Dust

BOX #: 101

| Parameter | Results |
|------------------------|--------------|
| pH (TCLP) | 6.2 S.U. |
| Total CN (As Received) | 0.54 mg/kg |
| TCLP Arsenic | <0.0077 mg/L |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium | 1.6 mg/L |
| TCLP Chromium | 0.10 mg/L |
| TCLP Lead | 6.0 mg/L |

TCLP Mercury <0.0008 mg/L

TCLP Nickel <0.30 mg/L

TCLP Selenium <0.0080 mg/L

TCLP Silver <0.082 mg/L

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

QA/RC Goordinator

cc: File

| FAX # | ≠Pages - 1 | From: CHERYL HAWKINS | | |
|----------------------------|------------|----------------------|--|--|
| TO: TERRY BRADWAY | | ENVIRITE CORPORATION | | |
| CO: AMERICAN STEEEL FOUND. | | Phone: 216-456-6238 | | |
| FAX#: 216-821-4568 | | FAX#: 216-456-2801 | | |



1902 American Steel Foundries

1001 EAST BROADWAY * P. O. BOX 2060 * ALLIANCE, OHIO 44601

(216) 823 -6150 * FAX NO. (216) 821-4568

January 10, 1994

Certified Mail

Mr. Al Casanta BFI Willowcreek Landfill 1043 State Route 225 Atwater, Ohio 44201

Dear Sir:

WASTE STREAM CERTIFICATION

This letter is written in response to your letter of January 05, 1994.

Please renew the following waste streams for disposal by BFI for an additional twelve months:

- 1) FLOOR SWEEPINGS FROM STEEL FOUNDRY OPERATION OH 219 940212 202143 006
- 2) BROKEN CORE BUTTS OH 219 940212 202145 006
- 3) SPENT REFRACTORY FROM FURNACE & LADLES OH 219 940212 202144 006
- 4) SPENT FOUNDRY SAND OH 219 940212 202142 006
- 5) DEWATERED CLARIFIER SLUDGE OH 219 940326 203178 006

The subject waste streams are essentially the same as when tested during 1993 and changes are not anticipated during the next twelve months. Please renew the certifications for 1994. If a significant change takes place in the composition of any of the subject waste streams, your office will be immediately notified.

If you have any additional requests, comments or concerns, please do not hesitate to call(216) 823-6550 ext. 206.

cc: JFO

RBR

RML

CAR/RSW

Very truly yours,

T.C. Bradway

Environmental Manager

C:\WP51\SOLWASTE\WASTESTR.EAM

DATE

04/04/94

BFI Location

HEB 9

WILLOWCREEK LF

BFI Initiator

: CASANTA, A

Generator

: AMERICAN STEEL FOUNDRIES

Generator Location : ALLIANCE, OH

Waste Description

: COOLING BED DUST

wcd Number

: AB13320

BFI Number

85485

WASTE APPROVAL FORM

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial:

Facility. BFI Willowcreek, Mahoning, Lorain County & Glenwillow

Comments:

WCD resigned March 11, 1994 and updated with analysis April 4, 1994.

The following items were received by the Corporate Waste Approval Group:
1. Analysis from DeVor Laboratories.
2. MSD Sheets on Cerel Binder.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The weste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition & physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/219:855:217:218/950603/85485

CORPORATE WASTE APPROVAL GROUP

Paula J. Carboni

Technical Representative

COOLING BED DUST /#AB13320

AMERICAN STEEL FOUNDRIES

SPECIMEN I.D. NUMBER

COLLECTION TIME

14:30

94726365

ACCESSION NO.

94 726365

RECEIVED

03/14/94 REPORTED

03/29/94

COLLECTION DATE

03/11/94 CLIENT I.D. NUMBER LOCATION

6365

00000

| TI=ST |
|---|
| Burnellin and San |
| TCLP EXTRACTION PROC |
| TCLP METALS & BIAS % |
| ARSENIC |
| Spike recovery |
| BARIUM |
| Spike recovery |
| CADMIUM |
| Spike recovery |
| CHROMIUM |
| Spike recovery |
| SELENIUM |
| Spike recovery |
| MERCURY |
| Spike recovery |
| LEAD |
| Spike recovery |

Spike recovery TCLP SUPPL.METALS

Spike recovery

Spike recovery

CORROSIVITY SCREEN

REACTIVITY SCREEN

IGNITABILITY TEST

TCLP REVIEW

SILVER

NICKEL

COPPER

| 11-510 | | THERAPEUTIC R | NGE | UNITS |
|---------------------|-------------|----------------------------------|---------|--|
| NORMAL | ABNORMAL | en de la de | | en e |
| FINAL PH- | 5.03 | | | u t |
| <0.3 | | 0.0 | 5.0 | MG/L |
| 78
<2.0 | | 0.0 | 100.0 | %
MG/L |
| <0.03 | | 0.0 | 1.0 | %
MG/L |
| 108 | | 0.0 | 5.0 | %
MG/L |
| 106
<0.02 | | 0.0 | 1.0 | %
MG/L |
| 94
<0.003 | | 0.0 | 0.2 | %
MG/L |
| 100
<0.2 | | 0.0 | 5.0 | %
MG/L |
| 103 | | 0.0 | 5.0 | %
MG/L |
| 73 | | | | Х |
| <0.2
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105 | | | | MG/L |
| REACTIVE REACTIVE S | SULFIDE <2 | (2.0 PPM
2.0 PPM
(D4978 MI | ETHOD B | • |
| HOUSE BOOM | , HELHOU DI | B 7770 (11 | LIGHT D | |

SAMPLE IS NON-CORROSIVE, PH=9.25 ASTM D4980 METHOD B/USEPA 9040

SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION. ASTM D4982 METHOD B/ASTM D93

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24,1992 (57FR55114)

--- DIRECTORS ---Patrick K. Jaynes Ph.D. Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 365-3396

BFI WASTE SYSTEMS WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 ATWATER 44201 OH

#AB13320 COOLING BED DUST

SPECIMEN I.D. NUMBER

94726365

COLLECTION TIME

03/11/94 CLIENT LD: NUMBER LOCATION

COLLECTION DATE

14:30

94 726365

RECEIVED

ACCESSION NO.

03/14/94 REPORTED

03/29/94

AMERICAN STEEL FOUNDRIES

NORMAL ABNORMAL

6365

REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

--- DIRECTORS ---Patrick K. Jaynes Ph.D. Anthony Nasrallah Ph.D.



7655 Market Street, Suite 2500 Youngstown, Ohio 44512 (216) 758-5788 (800) 365-3396

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BFI WASTE SYSTEMS WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 ATWATER OH 44201



7655 Market Street • Suite 2500 • P.O. Box 3949 • Youngstown, Ohio 44513-3949

SAMPLE ANALYSIS REQUEST/CHAIN OF CUSTODY BROWNING-FERRIS INDUSTRIES

| | Location: | W11/0 | WCFLOK | | Client# | 623 | - |
|--|-------------------------------------|---|--|---|-------------|---------------------------------------|----------|
| | Billing Conti | rol #(Lab use | only) | 94. | - 2723- | 2 | • |
| | Purchase O | rder# | 219-7 | 237 | | · · · · · · · · · · · · · · · · · · · | - |
| | Generator/P | roject# | America | u Steel | found. | n (| - |
| | LAB ID# | 726365 | | WCD# | | 3320 | - |
| | Waste Desc
Number of a
Matrix | containers | | ر کریو ہے ۔
Multipha | | Organic | /ail |
| | ANALYSES | REQUESTED | | | RUSH | Y N | <i>-</i> |
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585
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502 | | Semi-volatile Pesticides/H Reactivity S Corrosivity S | pace Extraction bace Extraction bace Extraction backerecovers of the panel (Metal spike recovers + spike recovers + spike recovers + spike recovers of the panel of the panel spike recovers of the pa | es
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| Sample Sub | Buddomitted By: | J. | 3-11-94 | 2130 pm | j4.5 | ,£ | |
| Sample Co | uriered Bv: | | | | | | |
| AI Can | san Ta | | 3/17/94 | 10:00 | BII | | |
| Sample Rec | ceived By: | | | | <u> </u> | | |
| Dem | in Bras | y | 3/14/94 | 10:00 | DeYor L | aboratories | |
| | (| ſ | | | | | |





DATE

04/04/94

BFI Location

WILLOWCREEK LF

BFI Initiator

Casanta, a

Generator

AMERICAN STEEL FOUNDRIES

Generator Location : ALLIANCE, OH

Waste Description : SHOT BLAST DUST

WCD Number

AB13340

BFI Number

85484

WASTE APPROVAL FORM

Safety Precautions: Avoid Breathing Dust Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial:

Facility.. BFT Willowcreek, Mahoning, Lorain County & Glenwillow

Comments:

WCD resigned March 11, 1994 and updated with analysis April 4, 1994.

The following items were received by the Corporate Waste Approval Group: Analysis from DeVor Laboratories.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition & physical properties to that as defined above. This waste stream has been essigned BFI Waste Code: OH/219:855:218:217/950603/85484

CORPORATE WASTE APPROVAL GROUP

Paula/I. Carboni

Technical Representative

/#AB13340 SHOT BLAST DUST

. 0

AMERICAN STEEL FOUNDRIES

VAMES

SPECIMEN I.D. NUMBER

94726367

COLLECTION DATE

COLLECTION TIME

14+30

ACCESSION NO.

94 726367

RECEIVED

03/14/94 REPORTED 03/29/94

03/11/94 CLIENT LD. NUMBER LOCATION

6367 00000

AS REVISED NOVEMBER 24,1992 (57FR55114)

| [ES] | RESULT | THERAPEUTIC RANGE | UNITS |
|--|--------------------------------------|--|--|
| State of the State | NORMAL ABNORMAL | | and the second layer and the second |
| TCLP EXTRACTION PROC | FINAL PH=5.60 | | |
| TCLP METALS & BIAS % | | | 2 M.S. and Santonian Sci. |
| ARSENIC | <0.3 | 0.0 5.0 | MG/L |
| Spike recovery | 112 | | % |
| BARIUM | <2.0 | 0.0 100. | |
| Spike recovery | 96 | | ኧ |
| CADMIUM | <0.03 | 0.0 1.0 | MG/L |
| Spike recovery | 104 | | 7. |
| CHROMIUM | <0.3 | 0.0 5.0 | MG/L |
| Spike recovery | 108 | | * |
| SELENIUM | <0.02 | 0.0 1.0 | MG/L |
| Spike recovery | 105 | | % |
| MERCURY | <0.003 | 0.0 | MG/L |
| Spike recovery | 108 | | 7. |
| LEAD | <0.2 | 0.0 5.0 | MG/L |
| Spike recovery | 105 | | ኧ |
| SILVER | <0.2 | 0.0 5.0 | MG/L |
| Spike recovery | 108 | | X |
| TCLP SUPPL.METALS | | $\mathcal{L}_{\mathcal{L}}$ | |
| NICKEL | 2.09 | the process of the second of t | MG/L |
| Spike recovery | 99 | | |
| COPPER | <0.08 | a de compensario | MG/L |
| Spike recovery | 108 | | % |
| REACTIVITY SCREEN | REACTIVE CYANIDE | <2.0 PPM | and the second |
| | REACTIVE SULFIDE | | 190 m |
| | ASTM D5049 METHOD | D/D4978 METHOD 8 | |
| And Andrews Art and a second an | CAMPLE TO MEMORES | | • |
| CORROSIVITY SCREEN | SAMPLE IS NONCORRO | | |
| Sand the Control of t | ASTM D4980 METHOD | B/USEPA 9040 | · |
| IGNITABILITY TEST | CAMPIE HEATER TO | | |
| TOWN CHOICE IT IES! | SAMPLE HEATED TO 1 ASTM D4982 METHOD | | 1 DK TONTITON" |
| | ASIN D4782 NEIHUD | 5/A5/M 073 | |
| TCLP REVIEW | | w | |
| COLL MEATEM | | | |
| | | | • |
| - | TCLP PREPARATION F | TOUC WETCON 171 | 11 CU_08/ |
| | CLF FREFARALIUM F | TOLLOWS NEIMOD 131 | 11 3W-546 |

--- DIRECTORS ------ PATHOLOGISTS ---Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D.BFI WASTE SYSTEMS

WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 ATWATER 44201 OH

D#AB13340 SHOT BLAST DUST

AMERICAN STEEL FOUNDRIES

SPECIMEN I.D. NUMBER

94726367

COLLECTION TIME

CLIENT I.D. NUMBER LOCATION.

RECEIVED 03/14/94 REPORTED 03/29/94

ACCESSION NO.

94 726367

RESULT NORMAL

ABNORMAL

6367 00000

REVIEWED

BY ALBERT F. VICINIE III, LAB SUPERVISOR

--- DIRECTORS ------ PATHOLOGISTS ---Patrick K. Jaynes Ph.D. John C. York II. M.D.

[^]nthony Nasrallah Ph.D. Arlington G. Kuklinca M.D.BFI WASTE SYSTEMS

WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 ATWATER OH 44201



gPelifical course.

DATE -04/04/94

BFI Location : WILLOWCREEK LF

BFI Initiator : Casanta, a

Generator : AMERICAN STEEL FOUNDRIES

Generator Location : ALLIANCE, OH

Waste Description : CLAY OIL DRY & PAINT SLUDGE

WCD Number : AB13321 BFI Number : 85488

WASTE APPROVAL FORM

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial:

Facility.. BFI Mahoning, Willowcreek, Lorain County & Glenwillow

Comments:

WCD resigned dated March 11, 1994 and updated with analysis April 4, 1994,

The following items were received by the Corporate Waste Approval Group:
1. Analysis from Devor Laboratories.
2. MSD Sheets on the paint.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the weste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste approval is based upon a review of the information provided by the generator and is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition & physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OR/855;219;218;217/950522/85488

CORPORATE WASTE APPROVAL GROUP

Technical Representative

321 CLAY OIL DRY W/ PAINT

SPECIMEN I.D. NUMBER

94726366

ACCESSION NO. **94 726366**

COLLECTION DATE

COLLECTION TIME

RECEIVED

03/11/94 CLIENT LD. NUMBER LOCATION

6366 00000

14:30

03/14/94 REPORTED

03/30/94

| AMERICAN | STEEEL | FOUNDRIES |
|----------|--------|-----------|
| | | |

| TEST | RESULT | REFERENCE OF
THERAPEUTIC RAN | le= | UNITS | |
|----------------------|------------------|---------------------------------------|---------|--------------|--------------|
| | NORMAL ABNORM | | * 44. * | ÷ | ٠ |
| TCLP EXTRACTION PROC | FINAL PH=5.00 | | | | |
| ZERO HEADSPACE EXTRT | COMPLETED 03/15/ | 94 | | | |
| TCLP METALS & BIAS % | | | | | |
| ARSENIC | <0.3 | 0.0 | 5.0 | MG/L | |
| Spike recovery | 92 | T | | 7. | |
| BARIUM | <2.0 | 0.0 | 100.0 | MG/L | |
| Spike recovery | 96 | | | 7. | |
| CADMIUM | <0.03 | 0.0 | 1.0 | MG/L | |
| Spike recovery | 103 | | | % | |
| CHROMIUM | <0.3 | 0.0 | 5.0 | MG/L | |
| Spike recovery | 110 | | | 74 | |
| SELENIUM | <0.02 | 0.0 | 1.0 | MG/L | |
| Spike recovery | 94 | | | Х | |
| MERCURY | <0.003 | 0.0 | 0.2 | MG/L | |
| Spike recovery | 106 | | | ኧ | |
| LEAD | <0.2 | 0.0 | 5.0 | MG/L | |
| Spike recovery | 103 | | | 7. | |
| SILVER | <0.2 | 0.0 | 5.0 | MG/L | |
| Spike recovery | 95 | | | % | |
| TCLP SUPPL.METALS | | | | 4.54 (4.54) | |
| NICKEL | <0.2 | e e e e e e e e e e e e e e e e e e e | | MG/L | * 1.
- 21 |
| Spike recovery | 105 | | | 7. | |
| COPPER | <0.08 | | | MG/L | |
| Spike recovery | 105 | 4. | | % . | |
| TCLP VOA'S & BIAS % | | | | | 4.5 |
| METHOD NUMBER | 8240 | | | | |
| VINYL CHLORIDE | <0.002 | 0.0 | 0,2 | MG/L | |
| Spike recovery | 82 | | | 7. | |
| 1,1-DICHLOROETHYLENE | <0.002 | 0.0 | 0.7 | MG/L | |
| Spike recovery | 114 | | | X | |
| METHYL ETHYL KETONE | <1.0 | 0.0 | 200 | MG/L | |
| Spike recovery | 112 | | | ኧ | |
| CHLOROFORM | <0.002 | 0.0 | 6.0 | MG/L | |
| Spike recovery | 114 | | | 7. | |
| CARBON TETRACHLORIDE | <0.002 | 0.0 | 0.5 | MG/L | |
| Spike recovery | 112 | | | % | |
| BENZENE | <0.002 | 0.0 | 0.5 | MG/L | |
| Carla magazana. | 0.0 | | | -r | |

--- DIRECTORS ---

Spike recovery

--- PATHOLOGISTS ---

88

Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D.BFI WASTE SYSTEMS



WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 ATWATER OH 44201

7.

94726366

COLLECTION DATE 03/11/94

CLIENT I.D. NUMBER LOCATION

COLLECTION TIME.

RECEIVED

14:30

03/14/94 REPORTED

AMERICAN STEEEL FOUNDRIES

| AMERICAN STEEEL FOUNDRIE | 5 630 | 0 | 0000 | | 03/30/94 |
|--------------------------|----------------|--|-------------------------------|-------------|---------------|
| TEST | RESU
NORMAL | | REFERENCE C
THERAPEUTIC RA | R
NGE | UNITS |
| 1.2-DICHLOROETHANE | <0.002 | | 0.0 | 0.5 | MG/L |
| Spike recovery | 102 | | | | % |
| TRICHLOROETHYLENE | <0.002 | • | 0.0 | 0.5 | MG/L |
| Spike recovery | 104 | | | | ኧ |
| TETRACHLORDETHYLENE | <0.002 | | 0.0 | 0.7 | MG/L |
| Spike recovery | 118 | | | | % |
| CHLOROBENZENE | <0.002 | | 0.0 | 100.0 | MG/L |
| Spike recovery | 90 | | | | % |
| 1,4-DICHLOROBENZENE | <0.002 | • | 0.0 | 7.5 | MG/L |
| Spike recovery | 104 | | | | |
| TCLP BNA'S & BIAS % | | | | | |
| METHOD NUMBER | 8270 | | | | |
| CRESOLS | <0.1 | | 0.0 | 200 | MG/L |
| Spike recovery | 67 | | | | 7. |
| 2,4-DINITROTOLUENE | <0.1 | • | 0.0 | 0.13 | MG/L |
| Spike recovery | 101 | | | | 74 |
| HEXACHLOROBENZENE | <0.1 | 4.5.4 | 0.0 | 0.13 | MG/L |
| Spike recovery | 77 | | | | 7. |
| HEXACHLOROBUTADIENE | <0.1 | | 0.0 | 0.50 | MG/L |
| Spike recovery | 65 | | | | Z |
| HEXACHLOROETHANE | <0.1 | | 0.0 | 3.0 | MG/L |
| Spike recovery | 81 | | | | 7. |
| NITROBENZENE | <0.1 | | 0.0 | 2.0 | MG/L |
| Spike recovery | 53 | | | | ኧ |
| PENTACHLOROPHENOL | <0.1 | | 0.0 | 100. | MG/L |
| Spike recovery | 97 | | | | 7 |
| PYRIDINE | <0.1 | | 0.0 | 5.0 | MG/L |
| Spike recovery | 50 | | | | 7. |
| 2,4,5-TRICHLORDPHEN | <0.1 | e de la companya de l | 0.0 | 400. | MG/L |
| Spike recovery | 115 | | | | % |
| 2,4,6-TRICHLOROPHEN | <0.1 | 1.3 | 0.0 | 2.0 | MG/L |
| Spike recovery | 105 | | | | 7. |
| REACTIVITY SCREEN | REACTIVE | CYANIDE < | 2.0 PPM | • | - |
| | REACTIVE | | .O PPM | | |
| | | 9 METHOD D/ | | ETHOD B | |
| | | | | | |

SAMPLE IS NON-CORROSIVE PH=6.36 ASTM D4980 METHOD B/USEPA 9040

--- DIRECTORS ------ PATHOLOGISTS ---

Patrick K. Jaynes Ph.D. John C. York II, M.D. Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D.BFI WASTE SYSTEMS



CORROSIVITY SCREEN

WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 OH ATWATER 44201

321 CLAY DIL DRY W/ PAINT

SPECIMEN I.D. NUMBER

94726366

ACCESSION NO.

94 726366

RECEIVED

03/14/94 REPORTED

03/30/94

COLLECTION DATE

03/11/94 CLIENT LD. NUMBER LOCATION

ABNORMAL

6366 2 00000

II 🚓 II

AMERICAN STEEEL FOUNDRIES

NOEMAL

UNITS

IGNITABILITY TEST

TCLP REVIEW

SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION. ASTM D4982 METHOD B/ASTM D93

COLLECTION TIME

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24,1992 (57FR55114) REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

--- PATHOLOGISTS ---- DIRECTORS ---Patrick K. Jaynes Ph.D. John C. York II, M.D.

Anthony Nasrallah Ph.D. Arlington G. Kuklinca M.D.BFI WASTE SYSTEMS

WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225

ATWATER

44201 · OH



Table 1 General Data Table

makiya qiyateri

American Waste Management Services, Inc.

Antech Ltd. Project No. 94-0890

Haste Characterization; AWS #4477; 4481; 4482; 4483; 4484; (Dave Hortman)
American Steel Foundry

| | | | | | Sample Ide | ntification | | |
|-----------------------------------|-----------------------------|-----------------------|--|---|--|---|--|---|
| Parameter | Anelytical
Method | <i>U</i> nit s | 9403-1211
Broken
Cor+s
(3/8/94) | 9403-1212
Shot
Blast Dust
(3/8/94) | 9403-1213
Cooling
Bed Dumt
(3/8/94) | 9403-1214
Ploor
Sweepings
(3/8/94) | 9403-1215
Clarifiar
Sludge
(3/8/94) | 9403-1216
Method
Blank
(3/15/94) |
| | | | | | | | | |
| Cyanide (Total) | 9012(1) | mg/kg | <1.0 | <1,0 | <1.0 | <1.0 | <1_0 | <1.0 |
| Flash Point | 1010(1) | *F | >200 | >200 | >200 | >200 | >200 | NAP(2) |
| pH | 9045(1) | pH units | 9,07 | 10.04 | 7.59 | 9.94 | 7,01 | HAP |
| Sulfide (Reactive) | 7,3,4,1/8030 ⁽¹⁾ | mg/kg | <10 | 15 | <10 | <10 | <10 | <10 |
| Polychlorinated Biphenyls | 8080(1) | mg/kg | <1.0 | <1.0 | <1.0 | <1.0 | <1.0 | <1.0 |
| TCLP Metals: (3) | | | | | | | | |
| Silver (TCLP) | 6010(1) | mg/1 | <0.10 | <0.10 | <0.10 | <0.10 | <6,20 | <0.10 |
| Arsenic (TCLP) | 5018 ⁽¹⁾ | mg/1 | <0,10 | 0.10 | <0.10 | <0,10 | <0.10 | <0.10 |
| Barium (TCLP) | 6010(1) | mg/l | <10 | <10 | <10 | <10 | <10 | <10 |
| Cadmium (TCLP) | 6010(1) | mg/l | <0.10 | 0,27 | <0.10 | <0,10 | <0.10 | <0.10 |
| Chromium (TCLP) | 6010 ⁽¹⁾ | mg/l | <0.10 | 3.4 | <0.10 | 0.15 | <0.10 | <0.10 |
| Mercury (TCLP) | 7470(1) | mg/l | <0.010 | <0.010 | <6.010 | <0,010 | <0.010 | <0.010 |
| Lead (TCLP) | 6010(1) | mg/l | <0.10 | 0.36 | <0.10 | <0.10 | <0,10 | <0.10 |
| Selenium (TCLP) | 7740(1) | mg/l | <0.10 | <0.10 | <0.10 | <0.10 | <0,10 | <0,10 |
| TCLP Extraction Pluid Data: | | | | | | | | |
| Extraction Fluid | 1312(1) | - | No.1 | No.2 | No.1 | No.1 | No.1 | Ro, 1 |
| pH with Deionized Water | | pH units | 10.34 | 9,36 | 8,23 | 10.30 | 8.77 | nap |
| pH After Addition of 1 Normal HCL | | pli units | 1.20 | 6,07 | 1.54 | 2,23 | 1.30 | RAP |
| pH of ICLP Extract | | pH units | 4.79 | 5.21 | 4.91 | 5,57 | 4.85 | 4.89 |
| Amount of Sample Extracted | | -
B | 40.0 | 40.0 | 40.0 | 40.0 | 40.0 | NAP |

⁽¹⁾U.S. Environmental Protection Agency, 1987, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

⁽²⁾ NAP = Not applicable.

⁽³⁾TCLP - Toxicity Characteristic Leaching Procedure.

Table 2 TCLP(1) Organic Analyses American Waste Management Services, Inc. Antach Ltd. Project No. 94-0889

Waste Characterization; AWS #13538; 13539; 13540; (Dave Hartman) American Steel Foundry

| | | | | Sample Id | entification | |
|--|--|--|--|---|--|---|
| Paramater | CAS(2)
Number | Units | 9403-1207
Gil Dry
& Feint
(3/6/94) | 8403-1208
Spent
Foundry
Send
(3/8/94) | 9403-1209
Spent
Refractory
(3/8/94) | 9403-1210
Method
Blank
(3/15/94) |
| RCLP Volatile Organic Analyses: (8250) (3) Benzene 2-Butenone Carbon tetrachloride Chlorochenzene Chloroform 1,2-Dichlorocthene 1,1-Dichlorocthene Tetrachlorocthene Trichlorocthene Vinyl chloride TCLP Base/Neutral Extractables: (8270) (3) 1,4-Dichlorochene 2,4-Dinitrotoluene Eexachlorobutediene | 71-43-2
78-93-3
56-23-5
108-90-7
67-66-3
107-06-2
75-35-4
127-18-4
79-01-6
75-01-4
105-46-7
121-14-2
87-58-3 | #8/1 #8/1 #8/1 #8/1 #8/1 #8/1 #8/1 #8/1 | <50 <5000 <50 <1000 <500 <500 <50 <50 <50 <50 <50 <50 | <50 <5000 <500 <1000 <500 <500 <50 <50 <50 <50 <50 <50 <5 | <50 <5000 <50 <1000 <500 <500 <50 <50 <50 <50 <50 <50 <5 | <50 <5000 <500 <500 <500 <500 <50 <50 <5 |
| Hexachlorobenzens Hexachlorosthans Nitrobenzens Pyridins TCLP Acid Extractables:(8270)(3) Total Crasol (TCLP) Pentachlorophenol 2,4,5-Trichlorophenol 2,4,6-Trichlorophenol | 118-74-1
67-72-1
98-95-3
110-86-1
(4)
87-86-5
95-95-4
88-06-2 | με/1
με/1
με/1
με/1
με/1
με/1
με/1
με/1 | <100
<500
<100
<500
<5000
<5000
<100 | <500
<100
<500
<5000
<5000
<100 | <500
<100
<500
<5000
<5000
<5000
<100 | <500
<100
<500
<5000
<5000
<5000
<100 |

⁽¹⁾ TCLP = Toxicity Characteristic Leaching Procedure.

¹³⁾U.S. Environmental Protection Agency, 1987, Test Methods for Evaluating Solid Wasts, SW-846, 3rd ad., Office of Solid Wasts and Emergency Response, Washington,

DC. (4)_{m-Cresol} 108-39-4, o-Cresol 95-48-7, and p-Cresol 108-44-5.

Table 1. General Data Table American Waste Management Services, Inc. Antech Ltd. Project No. 94-0891 Waste Characterization; AWS #19541; (Dave Hartman) American Steel Foundry

| | | | Sample Id | entification |
|-------------------------------|----------------------|------------|-------------------------------|--|
| Parameter | Analytical
Method | Units | 9403-1217
51ag
(3/8/94) | 9403-1218
Method Blank
(3/15/94) |
| ASIM: | | | | \\ |
| Ac1d1ty | 305.1(1) | mg/l CaCO3 | ~ 287 | <2.00 |
| Alkalinity (ASTM) | 310.2(1) | mg/L CaCO3 | 354 | <2.00 |
| Chloride (ASTM) | 9251(2) | mg/1 | 4.4 | <0.50 ~~ |
| Cyanide: (ASTM) | 9012(2) | mg/l | <0.0050 | <0.0050 |
| Flouride (ASIM) | 9251(2) | mg/l | 4.6 | <0.10 |
| ph (ASTM) | 9040(2) | pH units | 11.72 | 7.30 |
| Phenolics (ASIM) | 420.2 | mg/l | <0.010 | <0.010 |
| Sulfate (ASIM) | 9038(2) | mg/l | 4.2 | <1.0 |
| Total Dissolved Solids (ASTH) | 160,1(1) | mg/l | 346 | <10 |
| letals: | | Wr - | 4.0 | ~10 |
| Arsenic (ASTM) | 7060(2) | mg/l | <0.050 | <0.050 |
| Barium (ASTK) | 6010(2) | mg/l | <10 | <10 |
| _ Cadmium (ASTM) | 6010(2) | mg/l | <0.10 | <0.10 |
| Chromium (ASTH) | 6010(2) | mg/l | <0.10 | <0.10 |
| Copper (ASTM) | 6010(2) | mg/l | <1.0 | <1.0 |
| _ Iron (ASTH) | 6010(2) | mg/1 | <10 | <10 |
| Hercury (ASTM) | 7471(2) | mg/l | <0.010 | <0,010 |
| Manganese (ASTM) | 6010(2) | mg/l | <1.0 | <1.0 |
| Lead (ASTN) | 6010(2) | ng/1 | <0.10 | <0.10 |
| Salenium (ASTM) | 7740(2) | ng/l | <0.010 | <0.010 |
| Zinc (ASTM) | 6010(2) | ng/l | <1.0 | <1.0 |

⁽¹⁾U.S. Environmental Protection Agency, 1983, Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio.

⁽²⁾U.S. Environmental Protection Agency, 1987, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DG.

Table 1 General Data Table

American Waste Management Services, Inc.

Antech Ltd. Project No. 94-0889

Waste Characterization; AWS #13538; 13539; 13540; (Dave Hartman)

American Steel Foundry

| | | | | Sample Id | entification | |
|-----------------------------------|-----------------|-------------|-----------|-----------|--------------|-----------|
| | | | | 9403-1208 | | |
| | | | 9403-1207 | Spent | 8403-1209 | 8403-1210 |
| | | | Oll Dry | Foundry | Spent | Method |
| | Analytical | | & Paint | Sand | Refractory | Blank |
| Parameter | Method | Units | (3/8/94) | (3/8/94) | (3/8/94) | (3/15/94) |
| Cyanide (Total) | 9012(1) | mg/kg | 1.5 | <1.0 | <1.0 | <1.0 |
| Flash Point | 1010(1) | ₹É | >200 | >200 | >200 | NAP(2) |
| Paint Filter | 9095(1) | x | 0,00 | 0.00 | 0.00 | NAP |
| Ro | 9045(1) | pH units | 6.07 | 9.01 | 6,34 | NAP |
| Sulfide (Reactive) | 7.3.4.1/8030(1) | mg/kg . | <10 | <10 | <10 | rap |
| Polychlorineted Biphenyls | 8080(1) | mg/kg | <1.0 | <1.0 | <1.0 | <1.0 |
| CCLP Metale: (3) | | | | | | |
| Silver (TCLP) | 6010(1) | mg/1 | <0.10 | <0.10 | <0.10 | <0.10 |
| Arsenic (TCLP) | 6010(1) | mg/l | <0.10 | <0.10 | <0.10 | <0.10 |
| Barium (TCLP) | 6010(1) | mg/l | <10 | <10 | <1C | <10 |
| Cadmium (TCLP) | 6010(1) | mg/L | <0.10 | <0,10 | <0.10 | <0.10 |
| Chromium (TCLP) | 6010(1) | mg/l | 0.85 | <0.10 | <0.10 | <0.10 |
| Mercury (TCLF) | 7470(1) | mg/l | <0.010 | <0.010 | <0.010 | <0.010 |
| Leed (TCLP) | 6010(1) | $m_{\xi}/1$ | <0.10 | <0.10 | <0,10 | <0.10 |
| Selenium (TCLP) | 7740(1) | mg/l | <0.10 | <0.10 | <0.10 | <0.10 |
| TCLP Extraction Fluid Data: | | | | | | |
| Extraction Fluid | 1311(1) | - | No,1 . | No.1 | No.1 | No.1 |
| pH with Delonized Water | | pH units | 7,32 | 8,55 | 7,56 | HAP |
| pH After Addition of 1 Normal HCL | | pH units | 1.49 | 1.21 | 1,38 | NAP |
| pH of TCLP Extract | | pH units | 4.90 | 4.82 | 4.B4 | 4.90 |
| Amount of Sample Extracted | | ß | 75.0 | 100 | 100 | nap |

⁽¹⁾U.S. Environmental Protection Agency, 1987, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

⁽²⁾NAP * Not applicable.

⁽³⁾TCLP * Toxicity Characteristic Leaching Procedure.



1902 American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150 FAX NO. (216) 821-4568

June 10, 1994

WASTE MANAGEMENT DIVISION EPA, REGION V

CERTIFIED LETTER RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, HRE-8J U.S. EPA, Region V 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Barbara Mazur P 482 673 307

Chief, SWERB Section V Office of Regional Counsel U.S. EPA Region V, 5CS-TUB3 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Richard Clarizio P 482 673 309

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

Enclosed please find the revised Background Sampling Analysis for Electric Arc Furnace Baghouse Hazardous Waste Management Unit as amended in accordance with Mr. John Palmer's letter dated May 09, 1994. Since the plan was completely rewritten, for your convenience, we have also attached a two page memorandum that specifically outlines American Steel Foundries' responses to Mr. Palmer's concerns and notes the area of the Analysis in which the response is located.

This submittal is intended to meet the requirements of the Closure Plan for the Electric Arc Furnace Baghouse Hazardous Waste Management Unit, Appendix "D". It is also intended to meet the reporting requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107.

American Steel Foundries plans to perform closure of the Electric Arc Furnace Baghouse Hazardous Waste Management Unit during the August 1994 plant vacation shutdown period as stated in J.F.Oesch's letter to the Director, OEPA, dated January 11, 1994. Therefore, if upon review of this submission additional changes are required, please notify ASF as soon as possible because any delay at this point could cause us to miss the opportunity to close within the extended (180) day closure period.



CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

ours very truly

J. F!\Oesch
PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: BMW/RSW

JW

DJM

RML

RBR

Ohio EPA

P 482 673 310

Chief, Division of Solid and Hazardous Waste

1800 WaterMark Drive

P.O. Box 1049

Columbus, Ohio 43268-0149

Ohio EPA

P 482 673 312

Division of Solid and Hazardous Waste

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Ohio EPA

P 482 673 311

Supervisor, division of Solid and Infectious Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.

Amsted Industries, Inc.

44th Floor - Boulevard Towers South

205 N. Michigan Ave.

Chicago, Illinois 60601

P. C. Schillawski

P 482 673 313

Squire Sanders & Dempsey

4900 Society Center

127 Public Square

Cleveland, Ohio 44114-1304

P 482 673 314

Mahoning County Health District Chief, Solid Waste Program

2801 Market Street

Youngstown, Ohio 44507-1649

Attn: R.D.Setty

C:\WP51\HAZWASTE\EAFBSAPL.694



1902 American Steel Foundries

1001 EAST BROADWAY • ALLIANCE, OHIO 44601 • (216) 823-6150 FAX NO. (216) 821-4568

. 1994 APR 0 8 1994

April 01, 1994

OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V

CERTIFIED LETTER RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, HRE-8J U.S. EPA, Region V

P 738 585 686

U.S. EPA, Region V 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Barbara Mazur

Chief, SWERB Section V Office of Regional Counsel U.S. EPA Region V, 5CS-TUB3 77 West Jackson Blvd. Chicago, Illinois 60604 Attention: Richard Clarizio P 738 585 687

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

Progress Report # 8

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

RMT Engineering & Environmental Management performed the additional required background sampling on August 30,1993.

In a letter dated November 08, 1993, American Steel Foundries submitted a Background Sampling Analysis Plan for the Electric Furnace Baghouse Management Unit to the EPA for their review and approval. A speedy approval was requested because American Steel Foundries was concerned that delays in approval and weather conditions could have adverse effects on our ability to complete closure of the Electric Arc Furnace Closure Plan within the specified (180) day limit of the consent order which expires on April 02, 1994.

In a letter dated December 21, 1993, Mr. John Palmer, Environmental Specialist, OEPA, Northeast District Office instructed Mr. Terry Bradway, Environmental Manager, American Steel Foundries to apply for an extension to the (180) day limit requirement of the consent order because the Ohio EPA needed more time to complete their technical review of the Background Sampling Plan for the Electric Arc Furnace Baghouse Management Unit.

In a January 11, 1994 letter, American Steel Foundries formally requested an extension to the closure limit of the Electric Arc Furnace Baghouse Closure Plan in accordance with the OEPA's directive.

The Ohio EPA granted the extension request on February 03, 1994 in Mr.Donald R. Schregardus's letter to Mr. Terry Bradway.

We have received competitive bids for the Electric Arc Furnace Closure Plan work and can award the contract. However, we are currently awaiting Ohio EPA approval of the Background Sampling Analysis Plan for Electric Furnace Baghouse Waste Management Unit.

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

- 1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."
- 3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan within 30 days of U.S. EPA approval of the Plan.
- 4. Within thirty (30) days after the approval of the Groundwater Quality Assessment Plan in paragraph E.3 above, or

pursuant to any schedule contained therein, Defendant shall design, install and maintain a groundwater monitoring system capable of yielding groundwater samples for analysis in accordance with 40 C.F.R. # 265.91 and Ohio Admin Code # 3745-65-91 and the approved Groundwater Quality Assessment Plan.

- 5. Defendant shall submit to U.S.EPA and Ohio EPA written reports containing the results of all analyses conducted pursuant to the Groundwater Quality Assessment Plan of paragraph E.3 above, in accordance with the reporting requirements set forth therein and 40 C.F.R. # 265.93 and 265.94 and Ohio Admin. Code # 3745-65-93 and 94.
- 6. In the event that the sampling and analyses conducted pursuant to the approved Groundwater Quality Assessment Plan for the Sebring Facility reveals that hazardous waste or constituents have entered the groundwater, Defendant shall so notify U.S. EPA and Ohio EPA in writing within ten (10) days, and shall continue to monitor groundwater in accordance with the requirements of 40 C.F.R. # 265.93 (d) (7), Ohio Admin. Code # 3745-65-93 (d) (7) and the Groundwater Quality Assessment Plan.

RMT Engineering and Environmental Management completed the first sampling of the landfill wells in accordance with the Groundwater Quality Assessment Plan during the week of December 13, 1993 and on February 23, 1994 results of the sampling were submitted to the U.S. EPA and Ohio EPA with our recommendations for parameters for the next three sampling events in accordance with the Consent Decree.

In a March 08, 1994 letter to Mr. Terry Bradway, Mr. John Palmer of the Ohio EPA acknowledged receipt of the test results.

In a letter dated March 11, 1994, Mr. John Palmer of the Ohio EPA approved our recommendations for the groundwater sampling parameters.

Mr. Palmer's letter of March 11, 1994 also listed several additional comments relative to the groundwater monitoring program at the Sebring Facility. We are currently preparing our response to those comments and since they were not received in time for their incorporation into the sampling process prior to the second sampling, they were not totally included.

A second sampling of the groundwater monitoring wells was performed during the week of March 14,1994. Those results have not been received to date.

RMT will be performing the third sampling of the monitoring wells the week of June 13, 1994.

TEST RESULTS AND SAMPLING SUMMARY

Our experiments to reduce lead and cadmium in EAF dust continue.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period. We are currently moving into the next phase of our CLEAN SCRAP EXPERIMENTS. Our scrap mixture was changed in January of 1994 to include the addition of 10% obsolete plate in order to determine its impact on our furnace operation.

During this quarter several waste streams were recertified with BFI our waste hauler, see attachment "B". American Waste and BFI have also sampled several waste streams during this period but test results have not been received.

GENERAL

Please note the following change:

On January 12, 1994 Mr.T.C.Bradway, American Steel Foundries, was instructed by Ms. Barbara Mazur, U.S. EPA, Region V to change certified letter routing in the Chief, RCRA Enforcement Branch from the attention of Mr. John Saric to the attention of Ms. Barbara Mazur.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

D.F. Oach RBR

J. F. Oesch

PLANT MANAGER

TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D.OHIO)

cc: RSW

DJM

JW

ERH

RML

RBR

Ohio EPA P 738 585 688

Chief, Division of Solid and Hazardous Waste

1800 WaterMark Drive

P.O. Box 1049

Columbus, Ohio 43268-0149

Ohio EPA P 738 585 689

Division of Solid and Hazardous Waste

Northeast District Office

2110 East Aurora Road Twinsburg, Ohio 44087-1969

Ohio EPA Supervisor, division of Solid and Infectious Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.

Amsted Industries, Inc.

44th Floor - Boulevard Towers South

205 N. Michigan Ave.

Chicago, Illinois 60601

P. C. Schillawski

Squire Sanders & Dempsey

4900 Society Center,

127 Public Square

Cleveland, Ohio 44114-1304

Mahoning County Health District

Chief, Solid Waste Program

2801 Market Street

Youngstown, Ohio 44507-1649

Attn: R.D.Setty

C:\WP51\HAZWASTE\USVAMSTE.TB8

P 738 585 691

P 738 585 690

ATTACHMENT "A"

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries T.C. Bradway 1001 E. Broadway Alliance, OH 44601

Report Date: 03/18/94

Envirite Waste ID#: CS1373

Waste Description: EAF Furnace dust

Sample Collection Date: 03/08/94 Date Analysis Completed: 03/15/94

| Parameter | Results |
|------------------------|--------------|
| pH (As Received) | 9.0 S.U. |
| Total CN (As Received) | 1.0 mg/kg |
| TCLP Arsenic | <0.0077 |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium | 3.1 mg/L |
| TCLP Chromium | <0.10 mg/L |
| TCLP Lead | 9.8 mg/L |
| TCLP Mercury | <0.0008 mg/L |
| TCLP Nickel | 0.38 mg/L |
| TCLP Selenium | <0.0080 mg/L |
| TCLP Silver | <0.082 mg/L |

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

QA/RC/Coordinator

cc: File

TSR

RESAMPLE SAMPLE ANALYSIS REQUEST FORM

CORPORATION

| Canaratar Nama: | AMERICAN STE | EL FOUNDRIES | 5 | |
|-----------------------------------|--|--|---|--|
| Generator Name: Facility Address: | 1001 E. BROA | DWAY ST. | | ÷^ |
| radinty radioss. | ALLIANCE | OHIO | | 44601 |
| Stream Number: | CS1373 | | State Date Results Needed | 7 TO 10 DAYS |
| Waste Code: | D006, D008 | | Frequency: | EACH BOX |
| Volume: | | | | |
| Generator's Descripti | on / Identification of W
EAF FURNACE | | | |
| 44444 | D006, D008 | | | |
| Comments: | | | | |
| | TCLP METALS- | ONLY | | |
| | SAMPLE NO. O | 30894 K | BOX NO 1 | 16 |
| Request Submitted b | y: <u>T.C.BRADWAY</u> | | Date Submitted: | 49 80 80 |
| CERTIFICATION: | | | | |
| this document is removed the | epresentative. In the
sampler and witness | e event that I per
in the spaces belo | mple collection and t
sonally collected the
ow. If I have not colle | he sample accompanying sample, I have identified cted the sample, both the |
| · · | s are correctly identi | Seat of the section | | 406 |
| Date of Sampling: | 03/00 | 194 | Time of Sampling: | 11809m05 |
| Sampler's Name: | T | .C.BRADWAY | | |
| Title and Affiliation o | f Sampler: _{ENVIRO} | NMENTAL MANA | GER, AMERICAN S | FEEL FOUNDRIES |
| Sampler's Signature | T.C. 2 | Sunland | | |
| Witness's Name: | | | | |
| Title and Affiliation o | f Witness: | | · · · · · · · · · · · · · · · · · · · | |
| Witness's Signature: | | | | <i>Y</i> |
| ENVCHCDY.EAF | Cfrf | - M | Bill | , |
| Ple | ease submit sample pro | omotly. Organic ar | nalyses must be comple | eted within |

ease submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.

Recycled Paper

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

American Steel Foundries T.C. Bradway 1001 E. Broadway Alliance, OH 44601

Report Date: 03/18/94

Envirite Waste ID#: CS1373

Sample Collection Date: 03/01/94 Date Analysis Completed: 03/14/94

Waste Description: EAF Furnace dust

| <u>Parameter</u> | Results |
|------------------------|--------------|
| pH (As Received) | 9.0 S.U. |
| Total CN (As Received) | 0.50 mg/kg |
| TCLP Arsenic | <0.0077 |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium | 2.8 mg/L |
| TCLP Chromium | <0.10 mg/L |
| TCLP Lead | 12.5 mg/L |
| TCLP Mercury | <0.0008 mg/L |
| TCLP Nickel | <0.30 mg/L |
| TCLP Selenium | <0.0080 mg/L |
| TCLP Silver | <0.041 mg/L |

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

Muthym Howkins

DA/BC Goordinator

cc: File TSR

RESAMPLE SAMPLE ANALYSIS REQUEST FORM

CORPORATION

| | AMERICAN STE | EL FOUNDRIE | ls . | | |
|--|---|---|--|--|---|
| Generator Name: Facility Address: | 1001 E. BROA | DWAY ST. | | | · |
| · | ALLIANCE | OHIO | | 446 | 01 |
| Stream Number: | CS1373 | | State Date Results Nee | 7 TO 10 D | ZIP
AYS |
| Waste Code: | D006, D008 | | Frequency: | EACH BOX | |
| Volume: | *** | | | | |
| Generator's Descrip | tion / Identification of \
EAF FURNACE | DUST | | | |
| | D006, D008 | | | | |
| Comments: | | | | | |
| | TCLP METALS | ONLY | yr dawl dwel diwe | | |
| | SAMPLE NO. o | 30194A | BOX NO. | 150 | |
| Request Submitted | by: T.C.BRADWAY | | Date Submitted: | 3/2/94 | |
| CERTIFICATION: | | | | | |
| this document is in myself as both the | e designated the local
representative. In the
sampler and witness
ass are correctly iden | e event that I p
s in the spaces b | sample collection and
ersonally collected to
selow. If I have not co | d the sample ac
he sample, I ha
bliected the sam | ccompanying
we identified
ple, both the |
| Date of Sampling: | 3/1/90 | <u>1 (</u> | Time of Sampling | : Comp. | AM/PM |
| Sampler's Name: | $oldsymbol{T}_{i}$ | .C.BRADWAY | | | |
| Title and Affiliation | of Sampler: <u>ENVIRO</u> | MENTAL MANZ | AGER, AMERICAN S | TEEL FOUND | RIES |
| Sampler's Signature | i: <u>L'C</u> E | Salver & | | | |
| Witness's Name: | *************************************** | | 4 | | |
| Title and Affiliation | of Witness: | | | * ************************************ | |
| Witness's Signature | ·
· | | *************************************** | | |
| ENVCHCDY.EAF | Rell | Schart | 3-2-84 | | |

Please submit sample promptly. Organic analyses must be completed within 14 days of sample collection; otherwise, resampling will be necessary.



ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

Generator Name:

Generator Address:

Generator City, State, Zip:

American Steel Foundries

1001 E. Broadway Alliance, OH 44601

Report Date:

03/01/94

Envirite Waste ID: CS1373

Date Analysis Completed: 02/23/94

Sample Collection Date: 02/12/94

BOX #- 124

Waste Description: EAF Furnace Dust

| <u>Parameter</u> | <u>Results</u> |
|------------------------|----------------|
| pH (TCLP) | 6.4 S.U. |
| Total CN (As Received) | 0.50 mg/kg |
| TCLP Arsenic | <0.0077 mg/L |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium | 1.3 mg/L |
| TCLP Chromium | <0.10 mg/L |
| TCLP Lead | 3.8 mg/L |
| TCLP Mercury | <0.0008 mg/L |
| TCLP Nickel | <0.30 mg/L |
| TCLP Selenium | <0.008 mg/L |
| TCLP Silver | <0.082 mg/L |

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

cc:

File

TSR

MON RE DO TOKON FURTIET - AUTOMOTOURING AND MONTH - AUTOMOTOR

RESAMPLE SAMPLE ANALYSIS REQUEST FORM

CORPORATION

| Generator Name: | AMERICAN STEEL F | OUNDRIES | | |
|---|--|----------------|--|--|
| Facility Address: | 1001 E. BROADWAY | ST. | , | |
| | ALLIANCE | OHIO | | 44601 |
| Stream Number: | CS1373 | | State Date Results Neede | 7 TO 1.0 DAYS d: |
| Waste Code: | D006, D008. | | Frequency: | EACH BOX |
| Volume: | | | | |
| Generator's Description | / Identification of Waste:
EAF FURNACE DUST | r - | 4 D 1 | |
| | D006, D008 | | | |
| | | | | |
| Comments: | • | | | |
| | TCLP METALS ONLY | Υ | | |
| • • • • | | | - | |
| | SAMPLE NO. | | BOX NO. | 154 |
| Request Submitted by: | T.C.BRADWAY | , | Date Submitted: | 2/15/94 |
| CERTIFICATION: | | | • | |
| I certify that I have de
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myself as both the sa | esignated the location por
resentative. In the ever
mpler and witness in the
are correctly identified t | nt that I pers | mple collection and to
sonally collected the
ow. If I have not colle | the sample accompanying sample, I have identified acted the sample, both the |
| Date of Sampling: | TCB- | | | 2/12/94/comp. AM/PA |
| Sampler's Name: | T.C.B | RADWAY | | |
| Title and Affiliation of S | Sampler: ENVIRONMEN | TAL MANAG | ER, AMERICAN ST | EEL FOUNDRIES |
| Sampler's Signature: | | • | | |
| Witness's Name: | - | | | |
| Title and Affiliation of V | Witness: | ,, | , | |
| Witness's Signature: | | | | - |
| ENVCHODY EAF | | | | |

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

Generator Name:

Generator Address:

Generator City, State, Zip:

American Steel Foundries

1001 E. Broadway

Alliance, OH 44601

Report Date:

02/07/94

Envirite Waste ID: CS1373

Box #: P

Sample Collection Date: 01/22/94

Date Analysis Completed: 02/01/94

Waste Description:

EAF Furnace Dust

| Parameter | Results |
|------------------------|--------------|
| pH (TCLP) | 6.3 S.U. |
| Total CN (As Received) | 1.0 mg/kg |
| TCLP Arsenic | <0.0077 mg/L |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium | 2.5 mg/L |
| TCLP Chromium | <0.10 mg/L |
| TCLP Lead | 0.82 mg/L |
| TCLP Mercury | 0.0026 mg/L |
| TCLP Nickel | 0.36 mg/L |
| TCLP Selenium | <0.0080 mg/L |
| , | |

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

TCLP Silver

<0.041 mg/L

CC:

File TSR 216-456-2023

RESAMPLE SAMPLE ANALYSIS REQUEST FORM



| | AMERICAN STEEL FOUNDRIES 1001 E. BROADWAY ST. | | | |
|--|--|--------------------|---|---|
| Generator Name:
Facility Address: | | | | |
| | ALLIANCE | OHIO | | 44601 |
| Stream Number: | CS1373 | | State Date Results Need | 7 TO 10 DAYS |
| Waste Code: | D006, D008. | | Frequency: | EACH BOX |
| Volume: | | | | |
| Generator's Description | / Identification of V
EAF FURNACE | Vaste:
DUST | | |
| | D006, D008 | | | |
| · | | | | |
| Comments: | | | • | |
| | TCLP METALS | ONLY | .,,,, | |
| | | | | |
| | SAMPLE NO. € | 212494A | BOX NO. | . P |
| Request Submitted by: | by: T.C.BRADWAY | | Date Submitted: | 1/27/94 |
| CERTIFICATION: | | | | · |
| I certify that I have de
this document is rep
myself as both the sa
sampler and witness | moler and witness | in the enseas bold | mple collection and sonally collected thow. If I have not col | the sample accompanying a sample, I have Identified lected the sample, both the |
| Date of Sampling: | TCB | africa . | Time of Sampling: | 1/22/94 Com/AM/PA |
| Sampler's Name: | T. | .C.BRADWAY | • | |
| Title and Affiliation of S | Sampler: ENVIRO | MENTAL MANAC | ER, AMERICAN S | TEEL FOUNDRIES |
| Sampler's Signature: | *************************************** | | | 71.11 |
| Witness's Name: | · | • | | |
| Title and Affiliation of V | Vitness: | / | | |
| Witness's Signature: | Vaus | cour | | 1-25-94 |
| ENVCHCDY.EAF | , | - | | |

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

Generator Name: Generator Address:

Generator City, State, Zip:

American Steel Metals 1001 E. Broadway Street Alliance, OH 44601

Report Date: 01/14/94 Envirite Waste ID: CS1373

BOX #: 101

Sample Collection Date: 01/03/94 Date Analysis Completed: 01/10/94

Waste Description: EAF Furnace Dust

| Parameter | Results |
|------------------------|---------------|
| pH (TCLP) | 5.8 S.U. |
| Total CN (As Received) | 0.50 mg/kg |
| TCLP Arsenic | <0.0077 mg/L |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium | 1.64 mg/L |
| TCLP Chromium | 0.82 mg/L |
| TCLP Lead | 2.9 mg/L |
| TCLP Mercury | <0.00080 mg/L |
| TCLP Nickel | 0.62 mg/L |
| TCLP Selenium | <0.0080 mg/L |
| TCLP Silver | <0.082 mg/L |
| | |

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

DARC COORDINATOR

cc: File TSR RESAMPLE SAMPLE ANALYSIS REQUEST FORM



| | • | | | | | | • |
|--|---|---|--|--|--|--|--|
| | AMERICA | N STEEL FO | UNDRIES | ; | • | | |
| Generator Name: | 1001 F. | BROADWAY | ST - | | | | |
| Facility Address: | | | | | | | |
| | ALLIANC | E . | OHIO | · | | 446 | |
| Stream Number: | CS1373 | , | | State Date Results | 7
Needed: | TO 10 D | ZIP
AYS |
| Waste Code: | D006, D | 0008. | | Frequency: _ | E | ACH BOX | · |
| Volume: | | | *************************************** | | | | |
| Generator's Description | / Identificat
EAF FUR | ion of Waste:
NACE DUST | - | | • | | |
| | D006, D | 8000 | | | | | |
| | | | | | | | |
| Comments: | , | | | | | | |
| | TCLP ME | TALS ONLY | | | | | |
| | | | | | | | |
| | SAMPLE | NO. 0103 | APP | BOX NC | . 10 | <u> </u> | |
| Request Submitted by: | T.C.BRA | ADWAY | | Date Submit | ted: | 3/14 | |
| CERTIFICATION: | | | | • | • | | |
| I certify that I have de
this document is rep
myself as both the sa
sampler and witness | signated the
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| Date of Sampling: | | for Do | MANUE | Time of Sam | iolina: | 3/94 | AM/PN |
| Sampler's Name: | · ************************************ | T.C.BR | ADWAY () |) | · · | | |
| Title and Affiliation of S | | NVIRONMENT | AL MANAG | ER, AMERIC | AN STEE | L FOUNDE | RTES |
| Sampler's Signature: | ampior. | | | | | | |
| Witness's Name: | ` | | | | | | |
| Title and Affiliation of V | —
Vitness: | | | 2011002000 | | . 25-1 | |
| Witness's Signature: | | Redo by G | JUIRITE | 1-5-94 | 13 | 10- | |
| ENVCHCDY EAF | <u><u>-</u>-</u> | <u>, 11 4</u> | | 1 - [] | -U MA | - COW | |
| ENACHODI " EWL. | | | | | | | |

ENVIRITE CORPORATION

CERTIFICATION ANALYSIS REPORT

Generator Name: Generator Address:

Generator City, State, Zip:

American Steel Foundries

1001 E. Broadway Alliance, OH 44601

Report Date:

01/20/94

Sample Collection Date: 12/13/93

BOX #: 148

Envirite Waste ID: CS1373

Date Analysis Completed: 12/22/93

Waste Description: EAF Furnace Dust

| Parameter | <u>Results</u> |
|------------------------|----------------|
| рН (тсцэ) | 5.6 S.U. |
| Total CN (As Received) | 1.04 mg/kg |
| TCLP Arsenic | <0.0077 mg/L |
| TCLP Barium | <1.6 mg/L |
| TCLP Cadmium | 2.0 mg/L |
| TCLP Chromium | 0.20 mg/L |
| TCLP Lead | 13.7 mg/L |
| TCLP Mercury | <0.00080 mg/L |
| TCLP Nickel | 0.30 mg/L |
| TCLP Selenium | <0.0080 mg/L |
| TCLP Silver | <0.082 ma/L |

This analysis was performed for the sole and exclusive purpose of determining the acceptability of the waste for treatment at Envirite facilities. Envirite makes no representation or warranty, express or implied, as to the suitability of this analysis for any other use.

Analysis Approved by:

CC:

File TSR RESAMPLE SAMPLE ANALYSIS REQUEST FORM



| r Onta | | | · | • |
|----------------------------|--|----------------------------|--|--|
| | AMERICAN STEEL FO | DUNDRIE | S | |
| Generator Name: | 1001 E. BROADWAY | ST. | 941 | |
| Facility Address: | · • • • • • • • • • • • • • • • • • • • | ············· | | |
| | ALLIANCE | OHIO | State | 44601
ZP |
| Stream Number: | CS1373 · | | Date Results Needed | 7 TO 10 DAYS |
| Waste Code: | D006, D008. | | Frequency: | EACH BOX |
| Volume: | | | | |
| Generator's Description | / Identification of Waste:
EAF FURNACE DUST | | ٠ | |
| | D006, D008 | | - | |
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• | | | | |
| Comments: | | | | |
| | TCLP METALS ONLY | | *************************************** | - · · |
| | SAMPLE NO. | | BOX NO. | 148 |
| | Omin no . | | BOA NO. | |
| | T C BRANWAY | | | 1 - 100 |
| Request Submitted by: | I · O · DIGIDIZZI | • | Date Submitted: | 12/15/93 |
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| CERTIFICATION: | • | | | |
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| Date of Sampling: | when DDT | 3 75 | Time of Sampling: | 2/3/93 6 |
| Sampler's Name: | T.C.BR | ADWAY | rane or Sampang | 413 B Comp. AM/PI |
| Title and Affiliation of S | Samoler: ENVIRONMENTA | AL MANAG | ER, AMERICAN ST | EEL FOUNDRIES |
| Sampler's Signature: | | + | | |
| Witness's Name: | | | | |
| Title and Affiliation of \ | Witness: | | | TO THE RESIDENCE OF THE PARTY O |
| Witness's Signature: | | | . 244 | |
| ENVCHCDY.EAF | | | | |
| Pleas | se submit sample promptly. | Organic ar | nalyses must be comple | eted within |
| Guil . | days of sample collection; | unerwise, | resampling will be need | SSERY. Sheerend Private P. |



1902 American Steel Foundries

1001 EAST BROADWAY * P.O. BOX 2060 * ALLIANCE, OHIO 44601

(216) 823 -6150 * FAX NO. (216) 821-4568

January 10, 1994

Certified Mail

P 069 816 956

Mr. Al Casanta BFI Willowcreek Landfill 1043 State Route 225 Atwater, Ohio 44201

Dear Sir:

WASTE STREAM CERTIFICATION

This letter is written in response to your letter of January 05, 1994.

Please renew the following waste streams for disposal by BFI for an additional twelve months:

- FLOOR SWEEPINGS FROM STEEL FOUNDRY OPERATION OH 219 940212 202143 006
- BROKEN CORE BUTTS 2) OH 219 940212 202145 006
- SPENT REFRACTORY FROM FURNACE & LADLES OH 219 940212 202144 006
- SPENT FOUNDRY SAND 4) OH 219 940212 202142 006
- DEWATERED CLARIFIER SLUDGE 5) OH 219 940326 203178 006

The subject waste streams are essentially the same as when tested during 1993 and changes are not anticipated during the next twelve months. Please renew the certifications for 1994. If a significant change takes place in the composition of any of the subject waste streams, your office will be immediately notified.

If you have any additional requests, comments or concerns, please do not hesitate to call(216) 823-6550 ext. 206.

cc: **JFO**

RBR

RML

CAR/RSW

Very truly yours,

T.C.Bradway

Environmental Manager

C:\WP51\SOLWASTE\WASTESTR.EAM



Willowcreek Landfill District

January 5, 1994

Mr. W.D. Heestand, Jr. Safety & Environmental Supervisor American Steel foundries 1001 East Broadway Alliance, Ohio 44601

Dear Mr. Heestand,

This letter is being sent to notify you it is time to recertify your special waste streams. If your waste streams have not changed in the last year, we need a letter on your company's letterhead referencing the below listed waste streams and its lab number stating it has not changed. Please make sure you have the letter signed by the person who signed the original WCD. If this is a problem, please let me know because other alternatives can be made.

This will eliminate having to retest your waste streams provided we receive your letter before February 4, 1994.

If you should have any further questions please feel free to contact me, otherwise, we will be expecting your letter as soon as possible.

Please address all correspondence to the following address:

BFI Willowcreek Landfill 1043 State Route 225 Atwater, Ohio 44201

Thank you for your cooperation and continued concern with the environment.

- Waste Streams: 1) FLOOR SWEEPINGS FROM STEEL FOUNDRY OPERATION OH 219 940212 202143 006
 - 2) BROKEN CORE BUTTS
 OH 219 940212 202145 006
 - 3) SPENT REFRACTORY FROM FURNACE & LADLES OH 219 940212 202144 006
 - 4) SPENT FOUNDRY SAND
 OH 219 940212 202142 006
 - 5) DEWATERED CLARIFIER SLUDGE OH 219 940326 203178 006

Sincerely,

Al Casanta

Industrial Waste Coordinator



1902 American Steel Foundries

1001 EAST BROADWAY * P. O. BOX 2060 * ALLIANCE, OHIO 44601

(216) 823 -6150 * FAX NO. (216) 821-4568

September 03, 1993





CERTIFIED LETTER RETURN RECEIPT REQUESTED

Chief RCRA Enforcement Branch, 5HR-12 U.S. EPA, Region V 230 S. Dearborn St. Chicago, Illinois 60604 Attention: James Saric

Chief, SWERB Section V Office of Regional Counsel U.S. EPA Region V, 5CS-TUB3 77 West Jackson Blvd. Chicago, Illinois 60604

Attention: Richard Clarizio

P 329 880 566

P 329 880 567

Gentlemen:

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87 - 1284A (N.D. OHIO)

Progress Report # 5

This submittal is intended to meet the progress report requirements of Section X of the Consent Decree and the reporting requirements of Section V. Item 12 of the Ohio Consent Order NO. 1993CV01107. The numbering of each item conforms with the Consent Decree Sequence.

The following have been completed since the last report.

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

4. Immediately upon receipt of final approval or modification of the Alliance Closure Plan by Ohio EPA, Defendant shall implement the Plan in accordance with the requirements and the schedule contained therein. Defendant shall submit a copy of the final approved Alliance Closure Plan to U.S. EPA within five (5) days of the approval by Ohio EPA.

On August 05, 1993, American Steel Foundries received approval for the Electric Arc Furnace Closure Plan.

Since the approval, we have placed a purchase order with RMT angineering & Environmental Management to perform the additional required background sampling and on August 30,1993, those samples were taken. We are currently awaiting the test results.

We are in process of receiving competitive bids for the physical closure work and plan to award contracts in the near future.

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D. OHIO)

E. SEBRING FACILITY - GROUNDWATER REQUIREMENTS

- 1. All sampling and analysis procedures performed under this Decree shall conform to procedures contained in U.S. EPA publication "Test Methods for Evaluation of Solid Waste, SW-846."
- 3. Within thirty (30) days after entry of this Consent Decree, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a Groundwater Quality Assessment Plan for the Sebring facility in accordance with 40 C.F.R. # 265.93 and Ohio Admin. Code # 3745-65-93. Within 30 days of receipt of comments from U.S. EPA identifying any deficiencies in the Groundwater Quality Assessment Plan, Defendant shall submit to U.S. EPA, with a copy to Ohio EPA, a revised Plan that corrects any deficiencies identified by the U.S. EPA. The defendant shall implement the U.S. EPA approved or modified Groundwater Quality Assessment Plan with in 30 days of U.S. EPA approval of the Plan.

On July 8, 1993 the Ohio EPA submitted written comments to American Steel Foundries covering difficiences in the "Ground Water Quality Assessment Plan" and the "Ground Water Sampling and Analysis Plan" for the Sebring landfill. On August 5, 1993 American Steel Foundries responded to the Ohio EPA request and supplemented the plans. We are currently awaiting comments from the Ohio EPA.

TEST RESULTS AND SAMPLING SUMMARY

Our experiments to reduce lead and cadimum in EAF dust continue.

Since the last report, our test results indicate that not all loads of dust sampled are under regulatory limits for lead and cadmium. Therefore, we are pursuing a program with Envirite Corporation that will entail composite sampling of each load. The individual loads will be shipped off site as either hazardous or nonhazardous material, depending upon the sample test results. Only those loads that are clearly below regulatory limits will be shipped as nonhazardous material and all sampling will be completed before the load is permitted to be taken off site.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

In accordance with our bi-annual waste stream analysis program, we have started our re-sampling of all waste streams.

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D. OHIO)

GENERAL

Please be advised of the following changes:

- 1. On July 26, 1993, we were directed by Mr. James Saric from the U.S. EPA, Region V to change our certified letter routing in the Chief, RCRA Enforcement Branch from the attention of Ms. <u>Kimberly Ogle</u> to the attention of Mr. James Saric.
- 2. In accordance with the terms and conditions of the Ohio Consent Order # 1993CV01107, signed July 12 1993, we will be forwarding an additional copy of all reports required under Civil Action No. C87-128A (N.D. Ohio) to the attention of Ohio EPA, Supervisor, Division of Solid and Infectious Waste Management, Northeast District Office, 2110 East Aurora Ave., Twinsburg, Ohio 44087-1969.
- 3. Effective September 1 1993, Mr. John F. Oesch has assumed the duties of Plant Manager, Alliance Plant, American Steel Foundries and as such, he has become the official plant contact and the individual authorized to sign legal documentation for American Steel Foundries at that facility.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this progress report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

"I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portion(s) of this submission or document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete to the best of my knowledge."

Yours very truly,

J. F. Wesch PLANT MANAGE

/TCB

UNITED STATES V. AMSTED IND., INC. CIVIL ACTION NO. C87-1284A (N.D. OHIO)

cc: CAR

DJM

VTH

ERH

Ohio EPA

Chief, Division of Solid and Hazardous Waste

P 329 880 564

1800 WaterMark Drive

P.O. Box 1049

Columbus, Ohio 43268-0149

Ohio EPA

Division of Solid and Hazardous Waste

P 329 880 565

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Ohio EPA

P 329 880 570

P 329 880 563 Supervisor, division of Solid and Infectious Waste Management

Northeast District Office

2110 East Aurora Road

Twinsburg, Ohio 44087-1969

Edward J Brosius, ESQ.

Amsted Industries, Inc.

44th Floor - Boulevard Towers South

205 N. Michigan Ave.

Chicago, Illinois 60601

P. C. Schillawski

Squire Sanders & Dempsey

4900 Society Center

127 Public Square

Cleveland, Ohio 44114-1304

Mahoning County Health District

Chief, Solid Waste Program

2801 Market Street

Youngstown, Ohio 44507-1649

Attn: R.D.Setty

C:\WP51\HAZWASTE\USVAMSTE.TB5



902 American Steel Foundries

1001 EAST BROADWAY * P. O. BOX 2060 * ALLIANCE, OHIO 44601

(216) 823 -6150 * FAX NO. (216) 821-4568

July 8, 1993



Certified Letter Return Receipt Requested

Chief, RCRA Enforcement Branch, 5HR-12 U. S. EPA, Region V 230 South Dearborn Street Chicago, Illinois 60604 Attn: Kimberly Oogle

Certified No. P 738 585 537

Chief, SWERB Section V
Office of Regional Counsel
U. S. EPA Regional V, 5CS-TUB3
230 South Dearborn Street
Chicago, Illinois 60604
Attn: Richard Clarizio

Certified No. P 738 585 536

UNITED STATES V. AMSTED INDUSTRIES, INC. CIVIL ACTION NO. C87-1284A (N.D. OHIO)

Progress Report #4

This submittal is intended to meet the Progress Report requirements of Section X of the Consent Decree. The numbering of each item conforms with the Consent Decree sequence.

The following have been completed since the last report.

C. ALLIANCE FACILITY - TREATMENT, STORAGE AND DISPOSAL REQUIREMENTS

3. If Ohio EPA does not approve the Alliance EAF baghouse Closure Plan, defendant shall submit to Ohio EPA, with copy to U. S. EPA a revised or modified Alliance Closure Plan in accordance with Ohio Admin. Code 3745-66-12(D)(4).

On May 5, 1993, the OEPA sent a "Notice of Deficiency" to American Steel Foundries on the Closure Plan for the EAF Dust Collector Bag House area. Corrections to the Plan were made and resubmitted to the OEPA on June 3, 1993.



RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION #C87-1284A N.D. OHIO)

We are current with all reporting requirements and are awaiting Ohio EPA approval of the following:

- 1. The Sebring Facility Ground Water Assessment Plan.
- 2. The EAF Dust Collector Closure Plan as resubmitted on 6-3-93.
- 3. The Sebring Facility Closure Plan.
- 4. The Sebring Facility Test Plot Plan.

American Steel Foundries has submitted a test plot plan for the use of foundry material as an alternative to clay in the final cover design for the Sebring Landfill Facility Closure Plan and we are currently obtaining competitive contractor quotations for that work.

Test Results and Sampling Summary

Our experiments to reduce lead and cadmium in EAF dust continue.

Since the last report, test results have indicated that we are averaging below regulatory limits for EAF dust but we have not been able to keep all loads in the non-hazardous range.

We have approached Envirite Corporation who treats our EAF dust and are currently evaluating a progressive approach to dust disposal. The program would require a composite "Tclp" metals only analysis to be performed on each load of dust before the material leaves the plant. If the load is hazardous, then it would be treated by Envirite to render it non-hazardous before disposal. However, if the Tclp analysis indicates the load to be non-hazardous, then it would be disposed of by Envirite's County Environmental section as a non-hazardous material.

Attachment "A" shows the electric arc furnace dust composite sample reports that have been received since the last reporting period.

In accordance with our bi-annual waste stream analysis program, we have started our re-sampling of all waste streams.

An alternate waste stream was evaluated during the last two months and approximately 1½ cubic yards of a mixture of phenolic resin, sand and oil dry were disposed of by Browning Ferris Industries. The phenolic resin from a leaky pump had been contained with a mixture of oil dry and sand during clean up and was not reusable in our process because of the presence of the oil dry. The mixture was collected, stored, sampled and disposed of in accordance with EPA procedures. (Attachment "B").

RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION #C87-1284A (N.D. OHIO)

In addition, Browning Ferris Industries, our current solid waste handler, has recertified the following waste streams for an additional year:

1. Clay, oil dry and paint sludge.

2. Cooling bed dust.

3. Shot blast dust. (Attachment "D")

Envirite, our hazardous waste handler has recertified our "EAF" dust waste stream for an additional year. (Attachment "C").

American Steel Foundries is actively pursuing the processing of foundry waste materials to be used as cover materials for the landfill and are currently obtaining competitive quotations for the screening and separation of that material in accordance with closure specifications.

ACTIONS NOT COMPLETED AS REQUIRED

As of the time of the submittal of this Progress Report, all required actions have been completed and there are currently no anticipated problems.

CERTIFICATION

I certify that the information contained in or accompanying this submission or document is true, accurate, and complete to the best of my knowledge. As to those identified portions(s) of this submission of document for which I cannot personally verify its truth and accuracy, I certify as the company official having supervisory responsibility for the person(s) who, acting under my instructions, made the verification, that this information is true, accurate, and complete, to the best of my knowledge.

Yours very truly,

J. A. DÍFLOURE PLANT MANAGER

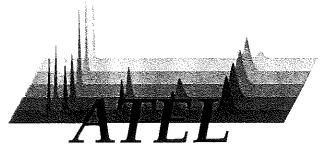
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JAD

Enclosure

RE: UNITED STATES V. AMSTED IND., INC. CIVIL ACTION #C87-1284-A N.D. OHIO)

Ohio EPA Chief, Division of Solid and Hazardous Waste 1800 WaterMark Drive P.O. Box 1049 P 738 585 535 Columbus, Ohio 43265-0149 Ohio EPA Division of Solid and Hazardous Waste Northeast District Office 2110 East Aurora Road P 738 585 534 Twinsburg, Ohio 44087-1969 Edward Brosius, Esq. AMSTED Industries, Inc. 44th Floor - Boulevard Towers South 205 N. Michigan Avenue Chicago, Illinois 60601 P 738 585 263 American Steel Foundries 10 South Riverside Plaza - 10th Floor Chicago, Illinois 60606 P 738 585 264 Attn: C. A. Ruud P. C. Schillawski Squire, Sanders & Dempsey 4900 Society Center 127 Public Square Cleveland, Ohio 4414-1304 P 738 585 265 Edward R. Hanson Project Manager American Steel Foundries Manufacturing Research Engineering Center 3761 Canal Street P 069 816 825 East Chicago, Indiana 46312



Aqua Tech Environmental Laboratories Inc.

To: AMERICAN STEEL FOUNDRIES 1001 E BROADWAY BOX 2060 ALLIANCE OH 44601

Attn: T C BRADWAY

: 10297 Client #

Your Sample ID: 042893 EAF DUST

Sample Matrix : SOLID

PO #: A-19981

Location :

Lab #

: 10-93-109803

Login Date : 05/07/93 Date Reported: 05/18/93

Date Printed: 05/18/93

COLLECTION INFORMATION

Date/Time/By: 04/28/93 COMP

BRADWAY

Report Approved By:

| Analysis | Result | Units | Analyst | EPA
Method No. | Date of
Analysis | Run
Number |
|------------------------|---------|--------------------------|---------|-------------------|---------------------|---------------|
| 10-93-109803 | | | | | | |
| SILVER, Ag, TCLP | < 0.10 | MG/L | LLL | 6010 | 05/13/93 | 05000307 |
| ARSENIC, As, TCLP | < 0.5 | MG/L | LLL | 6010 | 05/13/93 | 05000307 |
| BARIUM, Ba, TCLP | < 1.0 | MG/L | LLL | 6010 | 05/13/93 | 05000307 |
| CADMIUM, Cd, TCLP | 0.59 | MG/L | LLL | 6010 | 05/13/93 | 05000307 |
| CHROMIUM, Cr, TCLP | 0.41 | \mathtt{MG}/\mathtt{L} | LLL | 6010 | 05/13/93 | 05000307 |
| MERCURY, Hg, TCLP | 0.017 | MG/L | RCB | 7470 | 05/12/93 | 05000269 |
| LEAD, Pb, TCLP | < 0.10 | MG/L | LLL | 6010 | 05/13/93 | 05000307 |
| SELENIUM, Se, TCLP | 0.11 | ${\tt MG/L}$ | LLL | 6010 | 05/13/93 | 05000307 |
| TCLP METALS EXTRACTION | | | BSR | 1311 | 05/11/93 | 05000198 |



CANTON LABORATORY 5300 FULTON DRIVE N.W. CANTON, OHIO 44718 216-494-3324 FAX 216-494-2961

Chain of Custody Record

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Distribution:

White - Laboratory (include with reports)
Yellow - Laboratory (file copy)
Pink - Sample custodian
Gold - Field sampling records



AMERICAN STEEL FOUNDRIES

051493-1 RAF DUST 5-14-93

WO #: D3787

LAB #: A3E140024-001 DATE RECEIVED: 5/14/9

MATRIX: SOLID TCLP EXTRACTION DATE: 5/17/93
FINAL PH:5.9

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986)

| PARAMETER | RESULT | REPORTING
LIMIT | UNIT | <u>METHOD</u> | PREPARATION -
ANALYSIS DATE | QC
<u>BATCH</u> |
|-------------|--------|--------------------|------|---------------|--------------------------------|--------------------|
| TCLP METALS | | | | | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 5/17- 5/18/93 | 3137028 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 5/17- 5/18/93 | 3137028 |
| Barium | ND | 1.0 | mg/L | SW846 6010 | 5/17- 5/18/93 | 3137028 |
| Cadmium | 2.0 | 0.10 | mg/L | SW846 6010 | 5/17- 5/18/93 | 3137028 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 5/17- 5/18/93 | 3137028 |
| Lead | 3.8 | 0.10 | mg/L | SW846 6010 | 5/17- 5/18/93 | 3137028 |
| Selenium | 0.33 | 0.30 | mg/L | SW846 6010 | 5/17- 5/18/93 | 3137028 |
| Mercury | ND | 0.020 | mg/L | SW846 7471 | 5/17- 5/19/93 | 3137028 |
| | | | | | | |

NOTE:

AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT INITIAL PH 3.4

WADSWORTH/ALERT Laboratories

| CLIENT | CODE | | | |
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| QUOTE | / SAR | NUMBER | *************************************** | _ |

Division of Enseco Incorporated 4101 SHUFFEL DRIVE N.W./NORTH CANTON, OHIO 44720 (216) 497-9396 FAX (216) 497-0772

Nº 28631

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/ ,' ɔ ২ɲ | | ved by: (Signat | 'ure) | P | Relinq | uishe | d by: | (Signatu | ıre) | Į. | Date | / Time | Received by: (Signature) |
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| Relinquish | ned by: (S | | Date / Time Received for Laboratory (Signature) Distribution Original Accompanies Shipment. Copy returned w | | | | | Shaves | | 5-14- | | / Tim |)e | Rema | arks | | | in the second se | | |
| FORM 003 | | L | ,,5(11) | 20011 | zilgirlai A | 000111 | parii 63 O | TIPITIO II | ., ၁၀၉၄.10(0) | ou man nopola | | | s. citige | - | | | | | | -eu- |

| CLIENT C
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Chain-of | SAR N | | | | | | WADSWORT
4101 SHUFFEL DR | | NORT | H CA | | | | | | | | Nº 18379 | |
|---------------------------------|-------------|----------|--------------|---|--------------|-------------|-----------------------------|----------|----------------|-----------------|----------|-----------|----------|-----|-----------|--------|------|---------------------------|--|
| PROJ. | | PROJE | CT N | NAME | i/LOCATIOI | N | C FOUNDEIR | | | | S/P/ | ARA
X | MET | ER | , , | | | | |
| TIC | Ba | (401 | <i>U/3</i> . | RICAN STARL FOUNDERS | | | | | s XV | \(\frac{1}{2}\) | | | | | // | / | | REMARKS | |
| STA. NO. | DATE | | | GRAB. | | STATI | ION LOCATION | | X _C | N. | | | | | | | | | |
| 042883 | 428/9 | | X | | EAF | F | UR-MACK DUST | | X | | | | | | | | | | |
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| Relinquishe | ed by: (\$ | gnature) | | | Date | / Time | Received by: (Signature) | <u>.</u> | Reling | uisher | 1 by: (| Signatu | ra) | | <u> </u> |)ato / | Time | Received by: (Signature) | |
| T,C,Gr | ale | 12 | | | 5/6/93 | 3.04 | ' | · | | | | orginatu. | , 0, | | | | THE | riecelved by. (Signature) | |
| Relinquishe | ed by: (Si | gnavure) | | | Date | / Time | Received by: (Signature) | | Relinq | uished | f by: (8 | Signatui | re) | | Е | ate / | Time | Received by: (Signature) | |
| Relinquishe | d by: (Si | gnature) | | Date / Time Received for Laboratory by: (Signature) | | | | | -
ا- ما-5 | _ | / Time | | Rema | rks | . | | | | |
| | | Di | stribut | ion O | riginal Acco | mpanies S | Shipment. Copy eturned wit | | - ق ر | 13 | 3:0 | ⊃pr | <u> </u> | | | | | | |



AMERICAN STEEL FOUNDRIES

042893 EAF FURNACE DUST 4-28-93

WO #: D2367

LAB #: A3E060042-001

MATRIX: SOLID

DATE RECEIVED: 5/06/93

TCLP EXTRACTION DATE:

5/10/93

FINAL PH:8.3

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986)

| PARAMETER | RESULT | REPORTING
LIMIT | UNIT | <u>METHOD</u> | PREPARATION -
ANALYSIS DATE | QC
<u>BATCH</u> |
|-------------|--------|--------------------|------|---------------|--------------------------------|--------------------|
| TCLP METALS | ; | | | | | |
| Silver | ND | 0.10 | mg/L | SW846 6010 | 5/10- 5/13/93 | 3130046 |
| Arsenic | ND | 0.50 | mg/L | SW846 6010 | 5/10- 5/13/93 | 3130046 |
| Barium | ND | 1.0 | mg/L | SW846 6010 | 5/10- 5/13/93 | 3130046 |
| Cadmium | ND | 0.10 | mg/L | SW846 6010 | 5/10- 5/13/93 | 3130046 |
| Chromium | ND | 0.10 | mg/L | SW846 6010 | 5/10- 5/13/93 | 3130046 |
| Lead | ND | 0.10 | mg/L | SW846 6010 | 5/10- 5/13/93 | 3130046 |
| Selenium | ND | 0.30 | mg/L | SW846 6010 | 5/10- 5/13/93 | 3130046 |
| Mercury | ND | 0.020 | mg/L | SW846 7471 | 5/10- 5/12/93 | 3130046 |

NOTE:

AS RECEIVED

ND NOT DETECTED AT THE STATED REPORTING LIMIT INITIAL PH 5.1

| | LUATION REQUEST |
|--|--|
| BFI to complete this area. | Previous Laboratory Number |
| BFI Initiator AL CASANTAL | Management Method Requested: Landfill Hauling |
| Location 1843 STRT 225 Pluster | Other |
| Company Number 219 Date 3/19/93 | Disposal Site Requested Willows - = /larbunlang 50ml |
| Telephone Number (216) <u>947-7548</u> | Company Number 27/855 P.O. Number |
| Action Requested: New Waste Approval | Analyses Requested: ☐ TCLP ☐ RCI |
| ☐ Up-Date Approval ☐ Priority | ☐ Other _ |
| ☐ Other | Analyses To Follow: ATCLP A Other MISDS ATTACKED |
| WASTE CHAR | RACTERIZATION DATA |
| | pecial Waste |
| | SENTATIVE OF THE WASTE GENERATOR. PLEASE READ THE INSTRUC- |
| TIONS BEFORE COMPLETING THIS FORM THIS FORM IS TO | BE USED ONLY ONE TIME, AND MUST BE TYPEWRITTEN OR LEGIBLY |
| PRINTED IN INK, AND SIGNED. | BE USED ONLY ONE TIME, AND MUST BE TTPEWRITTEN OR LEGIBLY |
| | RATOR INFORMATION |
| | |
| a) Generator's Name: 17 mg STRING | e) Local Registration No. |
| b) Generating Facility Address: 1001 10 15 15 15 15 15 15 15 15 15 15 15 15 15 | Congrator's EDA Id No. ENATORS . OST - 1. |
| c) Company Representative: State: Sta | 1601 |
| c) Company Representative: | |
| Title: to year wie his plant | After Hours No. (Z/V) 11 |
| d) Emergency Contact: Signal | Emergency No. ('2 i \) |
| Title | |
| 2. GENERAL WA | STE STREAM INFORMATION |
| | |
| a) Description of The Waster Panalace Richard | GALD MAD OIL DEG |
| | 1100 |
| b) Process Generating Waste: 5000000000000000000000000000000000000 | in the second se |
| c) Is this a treatment residue of a waste which was previously a rest | tricted characteristically hazardous waste? [7] Yes [7] No. |
| d) Is this a "Hazardous Waste" as defined by State or local Regulati | ons? 🗌 Yes 🤼 No |
| If yes, enter the Waste Identification Number if one has been a | ssigned: |
| e) Is this a "Special Waste", an "Industrial Process Waste", or a "Po | olution Control Waste" as defined by State or local Regulations? |
| Yes \square No If yes, enter Waste Identification Number: $_$ | |
| f) Recommended personal protection equipment and special hand | dling procedures: |
| g) Anticipated Volume: | |
| Per: ☐ Day ☐ Week ☐ Month ☐ Year ☒ One Time, or | ☐ Gallons ☐ Tons ☒ Cubic Yards ☐ Other |
| To be transported in: \(\overline{\overline} \) Bulk \(\overline{\overline} \) Drums (type/size) | |
| h) Is a representative sample included? A Yes No – If yes, con | Other |
| | inplicate the Rocal Idaha of the reverse side. |
| 3. WASTE | PROPERTIES @ 72°F |
| a) Physical State: | d) Layers: |
| ☐ Solid ☐ Semi-solid | Single Phase |
| ☐ Powder ☐ Liquid | , <u> </u> |
| ☐ Combination | e) Density Range: 为 1 |
| b) Odor: | ☐ lbs./yd.³ ☐ Other |
| Describe, RESIL | - f) Color(s): |
| □ None □ Mild □ Strong | Describe BLACK, BROWN |
| c) Flash Point, °F: | g) pH: |
| □≤72 □ 73-100 □ 101-140 | g) pri. □≤2.0 □ 2.1-5.0 □ 5.1-9.0 |
| ☐ 141-200 ☐ ≥ 201 ☐ N/A ☒ N/D | — · · · · · · · · · · · · · · · · · · · |
| | |
| | REACTIVITY |
| Note if the waste exhibits any of \text{Water Reactive } \text{Alkalin} | ne Reactive |
| the following reactive properties: | olymerizable Explosive Shock Sensitive None of the above |

| | 5. THIS | WASTE CONTAINS | |
|--|---|---|---|
| Note if the waste contai | | | |
| ☐ Free Liquids | Dioxins | - | - w |
| ☐ Free Cyanide | ☐ Organic Solvents | ☐ Etiological Agents | □ Radioactive Materials |
| ☐ Free Sulfide | ☐ Used Oils | ☐ Pathogens | ☐ PCBs not regulated by |
| ☐ Free Ammonia | ☐ Virgin Oils | ☐ OSHA Substances | TSCA 40 CFR 761 |
| | are checked "Vec" coocify type (if a | ☐ Biological Materials | |
| Section 6 | are checked res , specify type (if a | pplicable) and include its concentration as | part of the waste composition. |
| odetron v. | | | ų arabanų |
| | | WASTE COMPOSITION | |
| Concentration ranges are percentages (%). Attach a | suggested, but total must equal 100% additional pages if necessary. | %. Units must be identified and are to be in | parts per million (ppm) and/or |
| Comm | Range | | Rango |
| Compone | | Components | Range
Min. / Max. |
| | | , | |
| | | / ₅ | |
| | | / | |
| the mon | | | |
| 7 3 7 1 1 1 2 1 3 1 3 1 | <u> </u> | | |
| | | TATION INFORMATION | |
| Proper USDOT Shipping N | zardous Material, complete the follow | | |
| USDOT Hazard Class: | UN or NA Number | CERCLA Reportable | e Quantity |
| | | ENTAL INFORMATION | |
| | D Sheets Analytical Date | ta ☐ Memo/Letter ☐ \ | Maria C |
| ☐ Other - describe | | | Waste Composition |
| | | | No. of Pages |
| | | OR'S CERTIFICATION | |
| I hereby certify that the ab
no deliberate or willful om
waste is not designated a
GENERATOR'S AUTHORIX | Hazardous Waste by the USEPA or co | lete and accurate to the best of my knowledg
xists, that all known or suspected hazards hav
ontains PCBs regulated by TSCA 40 CFR 76° | e and ability to determine, that
ve been disclosed, and that the
1. |
| News Tra | | | |
| DATE PRINT NA | ME VICIONIA | URE ENVIRONMEDIAL TITLE | MANNEY TO |
| - CKAT OA | SIGNATU | JRE 2 TITLE | INITIALS |
| | REPRESENTATIV | E SAMPLE CERTIFICATE | |
| This Section is to be comgenerator. DO NOT COLL | inleted by the person obtaining the | sample of the above described waste, pref.
RE RADIOACTIVE, SHOCK SENSITIVE, EXP | erably a representative of the |
| r certary trial trie samine in | POTITION DELOW that is boing to a consider. | I to BFI for evaluation is representative of the be acceptable for management by BFI Waste | |
| Collector's Name: | 1324DWM | (Peel Off Label | D |
| Signature: | - Jinani | | |
| Company to make | - 1 121-(11 <u>c</u> /H | | |
| Title: Town Roams | | | |
| Telephone Number: (21 6 | 1823-6150 ExT. 206 1 | gi | |
| | | | |
| | | | |
| wcd Rev: 9/91 | | • | |
| | | | |

WCD#AA79462 PHENOLIC RESIN

SPECIMEN I.D. NUMBER

93572449

ACCESSION NO.

VOOLSSION NO

COLLECTION DATE

COLLECTION TIME

93 572449

05/19/93 CLIENT I.D. NUMBER LOCATION

14:45

RECEIVED

05/20/93
REPORTED

AMERICAN STEEL FOUNDRIES

2449

00000

06/07/93

TEST

RESULT

REFERENCE OR THERAPEUTIC RANGE

UNITS

CORROSIVITY SCREEN

IGNITABILITY TEST

TCLP REVIEW

ASTM D5049 METHOD D/D4978 METHOD B

SAMPLE NON-CORROSIVE, PH=6.67 ASTM D4980 METHOD B/USEPA 9040

SAMPLE HEATED TO 160F WITHOUT FLASH OR IGNITION. ASTM D4982 METHOD B/ASTM D93

TCLP PREPARATION FOLLOWS METHOD 1311 SW-846 AS REVISED NOVEMBER 24,1992 (57FR55114) REVIEWED BY ALBERT F. VICINIE III, LAB SUPERVISOR

all Took

Patrick K. Jaynes Ph.D. Anthony Nasrallah Ph.D. DEYOR Laboratories

7--- Market Street. Suite 2500 Youngstown, Ohio 44512. (216) 758-5768 (800) 365-3396 BFI WASTE SYSTEMS
WILLOWCREEK LANDFILL DISTRICT
1043 STATE ROUTE 225
ATWATER OH 44201

| (IMATE TESTING | G COSTS: //00 | | | | | OLINGIO | | |
|-----------------------------------|--|----------|------------------------|--|---------------|---|---------|--------|
| AUTHORIZATION | 3 Bruling BF | | HOU:
LABO | DRAT
Is in du: | ORY
STRIES | W.C.D.# CUSTOMER P.O.# | : 191 | |
| ¥ <u>_</u> 2 | SAMPLE AI | VAL YSI | S REQUEST
SPECIAL W | Γ / CHAD
'ASTE | A OE CA | TODY | | |
| Assigned to Laboratory: | Deyor Lat | /
2 | | victoria de la companya de la compa | Contact: | Rusty | | |
| Location: | Blum Ohi | 3 | | | | 158-57 | 88 | |
| ₩CD or
BFI Lab
No. | Waste Description | Y) | Volume/
Container | Matrix | Anal | Asea Bednesieq | • | F |
| 79462 | Phenolic Resin So | 140 | 18+ | SW | JU+ T3/9 | Vol Sen, | V = / | |
| 572449 | oi! | | | | | CI | | |
| | | | | | | | | |
| | | | | | <u> </u> | | | ****** |
| Remarks
Safety
Precautions: |) == soil; MP == multi Normal Laboratory Hygic | | Avoid ski | n/ | Avo | SS = semi-sol id breathing ors/dust [] | id . | |
| Special Handling/ | Storage | | | | | • | | |
| Sample(s) Taken | <u> </u> | : 51 | Time: 19932. | 45 1 | mpany: | usted his | w0, 10, | |
| Sample(s) Courie | Ta V | Date | Time: 1 | ay co | mpany: | | | |
| Sample(s) Receive | widh | Date: | Time:
20-93 | Co | ubruh: | Yor | | |
| ecciving laborato | ry's comments: | <u> </u> | | | • | THE | | |

Note: This form must be completed and returned with the analytical data report.

PHENOLIC RESIN

93572449

COLLECTION TIME RECEIVED

05/20/93 REPORTED

06/07/93

14:45

AMERICAN STEEL FOUNDRIES

WCD#AA79462

2449 00000

05/19/93 CLIENT I.D. NUMBER LOCATION

COLLECTION DATE

| 1.2-DICHLOROETHANE | TEST | RESULT | REFERENCE OR | | UNITS |
|--|---------------------------------------|--|-------------------|------------|---------------------------------------|
| Spike recovery | | NORMAL - ABNOFMAL | THERAPEUTIC RANGE | | |
| Spike recovery | 1,2-DICHLOROETHANE | <0.002 | 0.0 | 0.5 | Ma Cara |
| TRICHLOROETHYLENE | | ı | 0.0 | 0.3 | |
| Spike recovery | | | 0.0 | 0 5 | |
| TETRACHLOROETHYLENE | | | V = V | 0.0 | |
| Spike recovery 108 | | · 1 | 0 - 0 | 0.7 | |
| CHLOROBENZENE | | | G e C | 017 | • |
| Spike recovery | | 1 | 0.0 | 100 0 | |
| 1,4-DICHLOROBENZENE | Spike recovery | | W 11 W | 10010 | |
| Spike recovery | | 1 | 0.0 | 7 5 | · - |
| TCLP BNA'S & BIAS % METHOD NUMBER 8270 PYRIDINE | | | 414 | / • • | · · · — |
| METHOD NUMBER 8270 PYRIDINE <0.10 | | | | | /* |
| PYRIDINE <0.10 | | 8270 | | | |
| Spike recovery 61 o-CRESOL <0.10 | | 4 | 0.0 | * 0 | MC () |
| 0-CRESOL (0.10 0.0 200 MG/L Spike recovery 48 % M-CRESOL (0.10 0.0 200 MG/L Spike recovery 46 % Spike recovery 46 % 2.4-DINITROTOLUENE (0.10 0.0 0.13 MG/L Spike recovery 56 % HEXACHLOROBUTADIENE (0.10 0.0 0.50 MG/L Spike recovery 49 % HEXACHLOROETHANE (0.10 0.0 3.0 MG/L | Spike recovery | | 0.0 | 3.0 | - · - |
| Spike recovery 48 M-CRESOL <0.10 | | - | 0.0 | 200 | |
| m-CRESOL <0.10 | Spike recovery | | | 200 | |
| Spike recovery 46 p-CRESOL <0.10 | | | n | 300 | |
| p-CRESOL <0.10 | Spike recovery | | ď | 200 | |
| Spike recovery 46 2,4-DINITROTOLUENE <0.10 | | 3 | 0.0 | 200 | |
| 2.4-DINITROTOLUENE | Spike recovery | | 414 | 200 | |
| Spike recovery 56 HEXACHLOROBUTADIENE <0.10 0.0 0.50 MG/L Spike recovery 49 HEXACHLOROETHANE <0.10 0.0 3.0 MG/L | | . '7 | 0.0 | 0 13 | |
| HEXACHLOROBUTADIENE <0.10 0.0 0.50 MG/L Spike recovery 49 HEXACHLOROETHANE <0.10 0.0 3.0 MG/L | Spike recovery | | | 0.15 | - :: |
| Spike recovery 49 % HEXACHLOROETHANE <0.10 0.0 3.0 Mg/L | HEXACHLOROBUTADIENE | | 0.0 | 0.50 | |
| HEXACHLOROETHANE <0.10 0.0 3.0 MG/L | | 1 | 4.0 | 0.50 | |
| Spike parayany | | | 0.0 | 7 0 | · · · · · · · · · · · · · · · · · · · |
| The state of the s | Spike recovery | 33 | 414 | 3.0 | 7. |
| NITROBENZENE <0.10 0.0 2.0 MG/L | | | 0.0 | 2.0 | · - |
| Spike recovery 38 | Spike recovery | | 0.0 | 2.0 | |
| PENTACHLOROPHENOL <0.10 0.0 100. MG/L | | - ¬ - | ń n. n | 100 | |
| Spike recovery 63 | Spike recovery | | | 2001 | |
| 2,4,5-TRICHLOROPHEN <0.10 0.0 400. MG/L | | ia | i | 400 | |
| Spike recovery 58 | Spike recovery | 4 | 3.0 | TOUR | |
| 2.4.6-TRICHLOROPHEN <0.10 0.0 2.0 MG/L | | | 0.0 | 2.0 | ·- |
| Spike recovery 50 | Spike recovery | .: | | - · · | |
| HEXACHLOROBENZENE <0.10 0.0 0.13 Mg/L | | | 0.0 | 0.13 | |
| Spike recovery 50 % | · · · · · · · · · · · · · · · · · · · | N. A. | , | 4110 | |
| REACTIVITY SCREEN REACTIVE CYANIDE K2.0 PPM | REACTIVITY SCREEN | The state of the s | K2.0 PPM | | / 4 |

REACTIVE SULFIDE (2.0 PPM

--- DIRECTORS ----Patrick K. Jagnes Ph.D. Anthony Nasrallah Ph.D.

7655 Market Street, Suite 2500 Youngstown, Ohio 44512; (216),758-5788 (800): 365-3396

BFI WASTE SYSTEMS WILLOWCREEK LANDFILL DISTRICT 1043 STATE ROUTE 225 ATWATER 44201 AMERICAN STEEL FOUNDRIES

PHENOLIC RESIN

WCD#AA79462

SPECIMEN I.D. NUMBER

93572449

ACCESSION NO.

93 572449

COLLECTION DATE

COLLECTION TIME

RECEIVED

05/19/93 CLIENT I.D. NUMBER LOCATION

14:45

05/20/93 REPORTED

2449

00000

06/07/93

| TEST |
|-------------------------------------|
| |
| |
| TCLP EXTRACTION PROC |
| ZERO HEADSPACE EXTRT |
| TCLP METALS & BIAS % |
| ARSENIC |
| Spike recovery |
| BARIUM |
| Spike recovery |
| CADMIUM |
| Spike recovery
CHROMIUM |
| |
| Spike recovery
SELENIUM |
| Spike recovery |
| MERCURY |
| Spike recovery |
| LEAD |
| Spike recovery |
| SILVER |
| Spike recovery |
| TCLP SUPPL.METALS |
| NICKEL |
| Spike recovery |
| COPPER |
| Spike recovery |
| TCLP VOA'S & BIAS % |
| METHOD NUMBER |
| VINYL CHLORIDE |
| Spike recovery 1,1-DICHLOROETHYLENE |
| Spike recovery |
| METHYL ETHYL KETONE |
| Spike recovery |
| CHLOROFORM |
| Spike recovery |
| CARBON TETRACHLORIDE |
| Spike recovery |
| BENZENE |
| Spike recovery |

| RES | ULT | REFERENCE O |)A
Ange | UNITS |
|---------------------|--------------|-------------|------------|---------------|
| , NORMAL | ABNORMAL . | | | |
| | | | | |
| FINAL PH
5/22/93 | 1 | | | |
| 0/22/73 | | | | |
| <0.20 | | 0.0 | 5.0 | MG/L |
| 74 | | | | 7. |
| <0.50 | 1 | 0.0 | 100.0 | MG/L |
| 82 | | | | 7. |
| <0.03 | l . | 0.0 | 1.0 | MG/L |
| 89
0.30 | | 0.0 | | % |
| 97 | | 0.0 | 5.0 | MG/L |
| <0.02 | | 0.0 | 1.0 | %
MG/L |
| 85 | | | 1 1 0 | 7. |
| <0.002 | | 0.0 | 0.2 | MG/L |
| 113 | | | | % |
| <0.50 | | 0.0 | 5.0 | MG/L |
| 105
<0.05 | | 2.2 | , <u></u> | % . |
| 89 | | 0.0 | 5.0 | MG/L |
| 37 | | | | 7. |
| ·<0.20 | | | | MG/L |
| 100 | | | | 74 |
| <0.08 | | | | MG/L |
| 102 | | | | 7. |
| 9240 | | | | |
| 8240
<0.002 | | 0.0 | 2 2 | M = 4. |
| 94 | | 0.0 | 0.2 | MG/L |
| <0.002 | • | 0.0 | 0.7 | %
MG/L |
| 108 | | | w . , | 7. |
| <1.0 | Ç. | | 200 | MG/L |
| 86 | ý | | | 7. |
| <0.002 | : | 0.0 | 6.0 | MG/L |
| 100
0.002 | ý
.:
: | Δ Δ | 0 = | 7, |
| 112 | | 0.0 | 0.5 | MG/L |
| <0.002 | | 0.0 | 0.5 | %
MG/L |
| 110 | *. | | | ng/L
% |
| | | | | ·• |

DIRECTORS -Patrick K. Jaynes Ph.D. Anthony Nasrallah Ph.D. Laboratories

7655 Market Street, Suite 2500 Youngstown, Ohio 44512 (216) 758 5788 (800) 365,3396



BFI WASTE SYSTEMS WILLOWCREER LANDFILL DISTRICT 1043 STATE ROUTE 225

: 06/14/93

BFI Location

: WILLOWCREEK

BFI Initiator

: CASANTA, A.

Generator

: AMERICAN STEEL FOUNDRIES

Generator Location : ALLIANCE, OH

Waste Description

: PENOLIC RESIN, SAND & OIL DRY

BFI Lab Number

: 206185

PRETREATMENT & DISPOSAL RECOMMENDATION

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial:

Amount of Original Waste 100% by vol.

Sanitary.. BFI Mahoning & Willowcreek

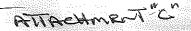
Comments:

Approved for one time only disposal. See the attached Chain of Custody and analytical data from DeYor Laboratories as received by the BFI Corporate Waste Approval Group.

The Material Safety Data Sheets received are currently on file with the BFI Corporate Waste Approval Group.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the waste for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste treatment and/or disposal recommendation is based upon a review of the information provided by the generator. This recommendation is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/855;219/940614/206185

CORPORATE WASTE APPROVAL GROUP





American Steel Foundries

1001 EAST BROADWAY * P.O. BOX 2060 * ALLIANCE, OHIO 44601

June 3, 1993

Certified Letter P 069 816 818 Return Receipt Requested

Ms. Cyndi Brownsword Technical Service Representative Envirite Corporation 2050 Central Ave., S. E. Canton, Ohio 44707

Dear Cyndi:

WASTE STREAM RECERTIFICATION

Attached are waste stream recertifications for waste streams Nos. CS0285 and CS1375. Please note that the only difference between the two is that CS0285 contains smokeater dust and CS1375 does <u>not</u>. I have also changed the primary contact, technical contact and emergency contact from W. D. Heestand to T. C. Bradway, as Mr. Heestand is no longer with our organization.

If you have any questions or concerns, please do not hesitate to call. (216) 823-6150, Ext. 206.

TCB:jlm

cc: JAD

CAR

RSW

NOW

Very truly yours,

T. C. Bradway

Ti Ci Bran

Environmental Manager

Attachment

WASTE PROFILE CHANGE AUTHORIZATION & CERTIFICATION

ENVIRITE

FORM

May 12, 1993

American Steel Foundries.

1001 East Broadway, Alliance, OH 44601

OHS981090418

CS0285

CANTON FAX#21645665

Dear

Envirte has reviewed the Waste Profile Information Form (WPIF) that it currently has on file for the above referenced waste stream. Please provide in the conseponding space(s) your response to the informational item(s) which Envirite has identified below, and also complete the "Generator's Certification" section. Erwide has not identified the need for additional information, then please complete only the "Generator's Certification" section. Please note that, for each subject iter the information you provide on this form will be used in lieu of the information which is currently in Envirite's files. Therefore, it must be the most accurate and up-to-dated the information which is currently in Envirite's files. that is known to you, as Envirite will rely upon it to ensure proper management of your waste stream. The code number following each item, in conjunction with the [endosed] code key, explains the basis of Envirite's request and/or the action that is being requested of you. Please contact Cyndl Brownsword at (216) 456-623 should you require assistance. Thank you for your attention in this matter.

| 111 | FORMATION NEEDED BY ENVIR | ITE . | INFORMATION PROVIDED BY GENERATOR |
|---------------------|--|-------|---|
| Section of WPIF | Informational Item | Code | Information |
| Hazards Information | (Per most recent analysis)
D005/D006/D008 | 7 | American Steel Foundries will manifest as |
| | ; | | D005/D006/D008 |
| | | | See Attachment : |
| | | | |
| | | | |
| | | | |

have taken these actions: 1) I have examined the WPIF referenced above. 2) Using my knowledge and/or laboratory analysis, I have reviewed the waste generating process and all other factors affecting the waste's physical traits and chemical composition. 3) I have reviewed all land disposal restriction treatment standards applicable to this waste stream. I hereby avow that all information on the Waste Profile Information Form-including all amending, confirming, and supplementar information provided by me on this Waste Profile Change Authorization and Certification Form, that is presently known to me, is disclosed. I confirm that, to the beginning that the confirmation provided by me on this Waste Profile Change Authorization and Certification Form, that is presently known to me, is disclosed. I confirm that, to the beginning that the confirmation provided by me on this Waste Profile Change Authorization and Certification Form, that is presently known to me, is disclosed. of my knowledge, my statements are correct and accurate representations of this waste material. I certify that I am an employee of the company which original generated this waste and that I am authorized to sign on my company's behalf.

| | T | C | Bradway |
|------|----|---------|---------|
| Nome | Τ. | \circ | Drauway |

Signature 103

June 1, 1993 Date

WASTE PROFILE CHANGE AUTHORIZATION & CERTIFICATION FORM

CORPORATION

May 12, 1993

American Steel Foundries

1001 East Broadway, Alliance, OH 44601 OHS981090418

CS1375

Dear,

Envirite has reviewed the Waste Profile Information Form (WPIF) that it currently has on file for the above referenced waste stream. Please provide in the corresponding space(s) your response to the informational item(s) which Envirite has identified below, and also complete the "Generator's Certification" section. Item information information, then please complete only the "Generator's Certification" section. Please note that, for each subject item is the information you provide on this form will be used in lieu of the information which is currently in Envirite's files. Therefore, it must be the most accurate and up-to-dated that is known to you; as Envirite will rely upon it to ensure proper management of your waste stream. The code number following each item, in conjunction with the lendsed code key, explains the basis of Envirite's request and/or the action that is being requested of you. Please contact Cyndi Brownsword at (216) 456-6238 should you require assistance. Thank you for your attention in this matter.

| INFORMATION NEEDED BY ENVIRITE | | | | INFORMATION PROVIDED BY GENERATOR | | | |
|---|--|------|--|---|--|--|--|
| Section of WPIF | Informational Item | Code | | Information | | | |
| Hazaids Information | (Per most recent analysis) - Dees / Doos / D | 7 | | This material wil be manifested as D006/D008 only. | | | |
| | | | | Smoke Eater Dust does not enter system as with CSU285 | | | |
| | | | | | | | |
| | | | | | | | |
| - manufathur and multiple to research (and a pro- | | | | | | | |

Generator's Certification

Thave taken these actions: 1) I have examined the WPIF referenced above. 2) Using my knowledge and/or laboratory analysis, I have reviewed the waste generating process and all other factors affecting the waste's physical traits and chemical composition. 3) I have reviewed all land disposal restriction treatment standards applicable to this waste stream. I hereby avow that all information on the Waste Profile Information Form—including all amending, confirming, and supplementary information provided by me on this Waste Profile Change Authorization and Certification Form, that is presently known to me, is disclosed. I confirm that, to the best of my knowledge, my statements are correct and accurate representations of this waste material. I certify that I am an employee of the company which originally generated this waste and that I am authorized to sign on my company's behalf.

| Name Terry C. Bradway | | June 1, 1993 |
|-----------------------|-------------------------|--------------|
| Kame | Signature 1, C. Brodway | Date |
| | | |

WASTE PROFILE INFORMATION FORM

| ENVIRITE | A WAR |
|-------------|-------|
| | |
| CORPORATION | War & |

| CUSTOMER INFORMATION: | | | | |
|--|---|---------------------------------------|---------------------------------------|----------|
| Name of GeneratorAmerican_Sceel_Poundries | | _ SIC | 3325 | · · |
| Facility Address 1001 East Broadway Street, Al | | | · · · · · · · · · · · · · · · · · · · | |
| Pickup Address As Above - | | for | 821 - | -4568. |
| Primary Contact Terry C. Bradway Titl | Environmental Manage | e r Phone | _(216) | 823-6150 |
| Technical Contact T. C. Bradway | 2 | _ Phone | (216) | 823-6150 |
| Emergency Contact T. C. Bradway After | er-hours Phone (216) 82 | 3-6150 | | |
| Parent Company AMSTED Industries, Inc., 44th | | | | |
| Generator EPA ID# OHD981090418 Gen | nerator State ID# | | Avenue, | Chicago, |
| Generator Address for Invoicing As Ahoxe | | | | |
| | | | | |
| WASTE INFORMATION: | c Furnaca Dust | | | |
| Generator's Description/Identification of WasteElectric Ar | • | | | |
| Physical State at 20°C (68°F) — (Check one box.) Solid A | owder 📙 Sludge 🔲 Liqu | id | | · |
| Other Characteristics — (Complete each blank.) | • | | | • |
| BOD | Color
Percent Solids
Number of Phases | Flash | Point | · |
| Generator Storage Method — (Check one box.) Tank | Rall Off Dump Trailer | | - , | |
| Does this waste contain flammables? Yes XNo Commer | ts | · · · · · · · · · · · · · · · · · · · | | |
| Does this waste have an obvious odor? | " describe | | | |
| Does this waste produce any explosive, combustible or toxic gases Comments: | | :? 🔲 Y | es & No | 0 |
| Waste Quantity: 30,000 LBS. Es | limated FrequencyEver | y- 10 d | ays | |
| SAMPLING: | | | | |
| Type of Sampler—(Check one box.) Coliwasa Sludge Jud | - | | | |
| Is this a composite sample? | now many samples: | - | | |
| !dentify source of sample (e.g., lagoon, tank, etc.) | | | | |
| SHAOEO AREA FOR ENVIRITE USE ONLY | | | | |
| 150585P | DATE NEEDED | | | |

| PROCESS INFORMATION: |
|---|
| Please briefly describe the process which generates this waste. Include plating activity (i.e., nickel, chrome, copper), raw solutions and base metals being plated. (Attach additional sheets if necessary.) |
| Dust comes from Baghouse which is connected to the electric arc furpace. The furnace |
| used to melt scrap steel. Smoke-easter baghouse dust is added 1/quarter at approximate |
| 200# which is D005 material. |
| |
| Are other products used in this area which may contaminate the waste (i.e., cleaning solutions or any other chemicals used by maintenance personnel)? Yes No If "yes," identify material and attach copy of Material Safety Data Sheet if available. |
| Material: |
| Are paint stripping operations on site? Yes No |
| Are cyanide plating operations on site? Yes 🖾 No |
| HAZARDS INFORMATION: |
| |
| Describe those hazards which you know or reasonably believe are associated with short-term or prolonged human exposure to this waste. Nondisclosure of information will be considered representation that you believe there are no adverse human health effects associated with exposure to this waste. Attach relevant documents as a part of your response if appropriate. |
| Acute and chronic toxicity of metals listed below |
| |
| |
| Is this waste an EPA-RCRA Hazardous Waste as described under 40 CFR 261 and equivalent state regulations? The proof of the lists shown below. |
| Characteristic Hazardous Wastes |
| ☐ D001 (Oxidizers) ☐ D004 (Arsenic) ☐ D007 (Chromium) ☐ D010 (Selenium) ☐ D002 (Corrosive) ☒ D005 (Barium) ☒ D008 (Lead) ☐ D011 (Silver) ☐ D003 (Reactive) ☐ D006 (Cadmium) ☐ D009 (Mercury) ☐ Other |
| Listed Hazardous Wastes |
| ☐ F006 ☐ F008 ☐ F011 ☐ K002 ☐ K005 ☐ K008 ☐ F007 ☐ F009 ☐ F012 ☐ K003 ☐ K006 ☐ K062 ☐ F019 ☐ Other ☐ K004 ☐ K007 ☐ Other ☐ C004 |
| |
| Is the waste subject to Land Disposal Restrictions (LDR) per 40 CFR 268 or its equivalent state regulations? Yes No |
| Does this waste require treatment to conform to Land Disposal Restrictions? Yes No |
| Per the LDR program's definition, the waste is a: Wastewater Nonwastewater Wastewaters" are wastes that contain less than 1% total organic carbon (TOC) and less than 1% total suspended solids (Nonfilterable Residues Test — Method No. 160.2 Methods for Chemical Analysis of Water and Wastes, EPA — 600/4-79-020, March 1983). Nonwastewaters" are those wastes that do not meet the definition of "Wastewaters." |
| Has EP Toxicity, TCLP or any other testing been done? X Yes No If "yes," please attach copies of all reports covering the last six months. |
| If the waste is not classified as hazardous under federal regulations, is it regulated as a hazardous or special waste in the state where it is generated? Yes TANO IT "yes," please list the state-specific waste codes that apply. |

93 10:04 ENVIRITE - CANTON FAX#2164562801 P.6/8

- If constituent is present, please give an estimate of range. If space is left blank, it will be assumed constituent is not present.

| METALS | | VOLATILE ORGANIC C | | OMPOUNDS | |
|--|--|--------------------|--|---|--|
| 1 | TOTAL CONCENTRATION Minimum Maximum ppm ppm | | | TUTAL CONCENTRATION Minimum Maximum ppm ppm | |
| Aluminum
Arsenic | ND ND | ٠ | Acrylonitrile (vinyl cyanide)
Benzene | ppm ppm
NA CA | |
| Barium
Beryllium
Boron | | | Bis(chloromethyl) ether Methylene chloride Methylchlormethyl ether | | |
| Cadmium
Chromium
Chromium (+ 6) | ND 17 ND ND ND ND ND ND ND N | | Methyl ethyl ketone
Tetrachloroethylene
Trichloroethylene | | |
| Copper
Iron | ND ND ND ND 50 200 | | Vinyl chloride
Carbon tetrachloride | | |
| Lead
Manganese
Mercury | ДИ ДИ ДИ ПИ | | Chloroform Other Other | | |
| Nickel
Selenium
Silver | ND 8
ND 02
ND ND | ٠. | Other | | |
| Tin
Zinc | 670 15,000 | | SEMI-VOLATILE ORGA | | |
| Other | | | | TOTAL CONCENTRATION Minimum Maximum ppm ppm | |
| ANIONS | TOTAL CONCENTRATION | | 1,2-Diphenylhydrazine
1-Naphthylamine | THAT THAT | |
| | Minimum Maximum
ppm ppm | • | 2-Naphthylamine
Anthracene
Benzidine | | |
| Chloride
Sulfate
Nitrate | TA TA | | Dioxins
Ethyleneimine
N-Nitrosodimethylamine | | |
| Flouride
Phosphate | | | p-Nitrosediphenylamine
Phenol
Other | | |
| CHELATING AGE | | | OtherOther | | |
| | TOTAL CONCENTRATION
Minimum Maximum | | GENERAL | | |
| Ammonia
Cyanide Total | ppm ppm UA VA | | | TOTAL CONCENTRATION Minimum Maximum | |
| Cyanide Amenable Cyanide Leachable Other | | | Asbestos
Carcinogens | ppm ppm | |
| | | | Herbicides
PCBs
Pesticides | | |
| | | • | Radioactives
Solvents
Organometallic Compounds | | |
| | | , | Other | | |

| 10:04 ENVIRITE — CANTON FAX#216456 | 528Ø1P.7/8 |
|---|--|
| TRANSPORTATION INFORMATION: | 4.0.5 |
| Proper DOT Shipping Name RQ Hazardous Waste Sol | id N-O-S. ORK-E |
| DOT Hazard Class C.F | DOT UN/NA Number NA 9189 |
| Will the temperature of the waste to be transported be greater | than 110°F? Yes |
| | and you are aware of who will be transporting the waste, please |
| Transporter Name | |
| Transporter EPA ID# | State Transporter ID# |
| | Phone |
| After-hours Emergency Contact | Phone |
| | |
| GENERATOR EMERGENCY RESPONSE PLAN: | |
| Do you have a written emergency-response/spill-prevention pla available? ☑ Yes ☐ No | n in force? 🔀 Yes 🗌 No If "yes," is a copy |
| Do you have a spill-response team? ☐ Yes ☐ No | |
| Are special precautions required at the time of pickup? \(\subseteq\) Yes | • |
| | |
| | • |
| CERTIFICATIONS: | |
| I certify that I have designated the location point(s) for sam
is representative. In the event that I personally collected the
witness in the spaces below. If I have not collected the sam
below. | iple collection and the sample accompanying this document a sample, I have identified myself as both the sampler and iple, both the sampler and witness are correctly identified |
| Date of Sampling Time of Sampling | AM/PM |
| Sampler's Name | |
| Title and Affiliation of Sampler | |
| Sampler's Signature | <u> </u> |
| Witness's Name | |
| Title and Affiliation of Witness | |
| Witness's Signature | |
| | |
| I hereby avow that any pertinent information that is known id
disclosed in the information contained herein and attached all statements and attached related to the contact of the contact | to this form. I confirm that to the hest of my knowledge |
| vame w. D. HEGOLAND, UK | Date 7/16/1 |
| 1 | 14 44 |

All information submitted on this form and its attachments will be kept confidential within the limits of existing environmental laws and regulations. We suggest that you retain a copy of this form and its attachments for your records.

-0520



Willowcreek Landfill District

June 15, 1993

Mr. T. C. Bradway Environmental Manager American Steel Foundries 1001 East Broadway Alliance, Ohio 44601

Dear Mr. Bradway,

This letter is being sent to confirm your undated approval for waste streams listed below. The new approval codes are:

- 1. SHOT BLAST DUST WILLOWCREEK OH 219 940603 85484 006
- 2. COOLING BED DUST WILLOWCREEK OH 219 940603 85485 006
- 3. CLAY OIL DRY AND PAINT SLUDGE CARBON LIMESTONE OH 855 940522 85488 006

PLEASE NOTIFY THE APPROPRIATE PERSONNEL OF THIS APPROVAL CODE UPDATE.

These numbers must be used on all your manifests from this point on. If you have any questions please feel free to contact me.

Thank you for your cooperation and patience in this matter.

Sincerely,

Rosana M. Marinchick

Divisional Sales Manager

Doona M. Marinchisk P.B.



: 06/08/93

BFI Location BFI Initiator

: WILLOWCREEK

Generator

: CASANTA, A

Generator Location : ALLIANCE, ON

: AMERICAN STEEL POUNDRIES

Waste Description

: SHOT BLAST DUST

BFI Lab Mumber

1 85484

216 536 6169

PRETREATMENT & DISPOSAL RECOMMENDATION

<u>Bafety Precautions</u>: Avoid Breathing Dust Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial:

Amount of Original Waste 100% by yol.

Sanitary.. BFI Willowcreek & Mahoning Comments:

WCD updated May 28, 1993.

The waste has the potential to cause dusting problems.

See the attached letter from the generator dated May 28, 1993, as an addendum to the WCD.

The original letter was not received by the BFI Corporate Waste Approval Group.

The above is a recommendation of BFI Corporate Wests Approval Group. It must be understood that management of the wests for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The weats treatment and/or disposal recommendation and any test data reported are based upon a review of the information provided by the generator and from the evaluation of a sample of the waste material identified as BFI 85484 which is reported to be representative of the wests material described on the enclosed BVI Wasts Characterization Data (NCD) sheet. This recommendation is contingent upon the receipt at the treatment and/or disposal facility of a weste material ossentially equivalent in chamical composition and physical properties to that as defined above. This waste stream has been assigned BYI Weste Code:

CORPORATE WASTE APPROVAL GROUP

Biana L. Lasco

: 06/08/93

216 536 6169

BFI Location

: WILLOWCREEK

BFI Initiator

: CASANTA, A

Generator

: AMERICAN STEEL FOUNDRIES

Generator Location : ALLIANCE, OH

Waste Description

: COOLING BED DUST

BFI Lab Number

1 85485

PRETREATMENT & DISPOSAL RECOMMENDATION

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial:

Amount of Original Waste 100% by vol.

Sanitary.. BFI Willowcreek & Mahoning Comments:

WCD updated May 28, 1993.

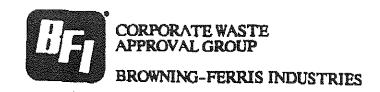
See the attached letter from the generator dated May 28. 1993, as an addendum to the WCD.

The original letter was not received by the BFI Corporate Waste Approval Group.

The above is a recommendation of EFI Corporate Wasts Approval Group. It must be understood that management of the wasts for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable federal, state, and local regulations. The waste treatment and/or disposal recommendation and any test data reported are based upon a review of the information provided by the generator and from the evaluation of a sample of the wante material identified as BFI 85485 which is reported to be representative of the waste material described on the enclosed EFI Waste Characterization Data (MCD) sheet. This recommendation is contingent upon the receipt at the treatment and/or disposal famility of a waste material essentially equivalent in chemical composition and physical properties to that as defined above. This waste stream has been assigned BFI Waste Code: OH/219;855/940603/85485

CORPORATE WASTE APPROVAL GROUP

Diana L. Lasco



: 06/08/93

BFI Location

: WILLOWCREEK

BFI Initiator

: CASANTA, A

Generator

: AMERICAN STEEL FOUNDRIES

Generator Location : ALLIANCE, OR

Waste Description

: CLAY OIL DRY & PAINT SLUDGE

BFI Lab Number

: 85488

PRETREATMENT & DISPOSAL RECOMMENDATION

Safety Precautions : Avoid Skin & Eye Contact

RECOMMENDED:

Direct Landfill Burial:

Amount of Original Waste 100% by vol.

Sanitary.. BFI Mahoning

Comments:

WCD updated May 28, 1993.

See the attached letter from the generator dated May 28, 1993, as an addendum to the WCD.

The original letter was not received by the BFI Corporate Waste Approval Group.

The above is a recommendation of BFI Corporate Waste Approval Group. It must be understood that management of the wasts for treatment and/or disposal at the designated facility must be in compliance with the facility's permit and applicable faderal, state, and local regulations. The waste treatment and/or disposal recommendation and any tast data reported are based upon a review of the information provided by the generator and from the evaluation of a sample of the waste material identified as BFI 85488 which is reported to be representative of the waste material described on the enclosed BFI Waste Characterization Data (MCD) sheet. This recommendation is contingent upon the receipt at the treatment and/or disposal facility of a waste material essentially equivalent in chamical composition and physical properties to that as defined above. This waste stream has been assigned RFI Weste Code: DH/855/940622/85488

CORPORATE WASTE APPROVAL GROUP

Biana L. Lasco